

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

Chris Martin,

Plaintiff,

v.

Cleveland City Council President Blaine
Griffin (in his official capacity),

Defendants.

Judge Charles Esque Fleming

DECLARATION OF ATTORNEY
ANDREW GERONIMO, LEAD
COUNSEL FOR PLAINTIFF

Counsel for Plaintiff Chris Martin, ANDREW GERONIMO, states of his personal
knowledge as follows:

1. I am over the age of 18 and competent to testify to the facts below based on personal knowledge.
2. I am the Director of the First Amendment Clinic at Case Western Reserve University School of Law. I have been the Director of the First Amendment Clinic since May 2020. I joined the Case Western Reserve University School of Law Faculty in April 2017 as the First Amendment Fellow, a position I held from April 2017-December 2018, and I was the Director of the Intellectual Property Venture Clinic from January 2019-April 2020.
3. I am a member in good standing of the bar of the State of Ohio (Registration # 0086630, Admitted November 2010), and have been admitted to practice before this Court and the United States Court of Appeals for the Sixth Circuit since 2012.
4. I am one of the attorneys representing Chris Martin in this matter and make this declaration in support of Mr. Martin's motion for an award of fees pursuant to 42 U.S.C. § 1983 and 42 U.S.C. § 1988(b).
5. The First Amendment Clinic is one of the several clinical offerings at Case Western Reserve University School of Law, operating as a single firm known as the Milton and Charlotte Kramer Law Clinic. In each of these clinics, CWRU law students practice under the supervision of licensed attorneys pursuant to Ohio Gov. Bar R. II and other applicable laws (e.g., N.D. Ohio Loc. R. 83.6) to represent clients in legal matters on a pro bono basis.

6. As required by Ohio Gov. Bar. R. II (and this Court's Local Rule 83.6), I have duties to supervise each of the Certified Legal Interns in their client representations and assume professional responsibility for their practice. As part of the supervised practice model contemplated by Gov. Bar R. II and Loc. R. 83.6, my colleagues and I instruct and supervise Certified Legal Interns to be sure they're working diligently, competently, and honestly on all client matters.
7. As part of our pedagogical clinical processes – and pursuant to our obligations under Ohio Gov. Bar R. II and internal policies and procedures – attorneys in the Clinic work with Certified Legal Interns to prepare for, execute, and reflect/evaluate student work product and other lawyering activities.
8. When training Certified Legal Interns Clinical faculty emphasize the importance of accurate timekeeping. Clinic policy requires Certified Legal Interns to track all of their time related to Clinic work in the Clinic's practice management software, and Clinical faculty review time entries several times throughout each semester. A true and accurate copy of the portion of the Clinic Manual on Timekeeping is attached as **Exhibit 1-A**.
9. Supervising attorneys in the Clinic emphasize the importance the applicable Rules of Professional Conduct which, among other things, prohibit materially false statements and other misconduct in the provision of legal services, avoiding excessive fees, and general duties of candor to colleagues, opposing counsel, and the court.
10. Attached hereto as **Exhibit 1-B** is a true and accurate copy of timekeeping records kept by the attorneys and Certified Legal Interns as indicated thereon. **Exhibit 1-B** reflects the tasks performed by each attorney/Certified Legal Intern, the date on which such work was completed, the time spent on each task, and the rate requested.
11. The number of hours that the First Amendment Clinic was required to spend in connection with this matter is, in my experience, typical for a complex First Amendment civil rights case proceeding in the Northern District of Ohio involving claims for damages and injunctive relief – especially considering the City's vigorous defenses of the claims.
12. All of the time entries in **Exhibit 1-B** reflect reasonable tasks performed by First Amendment Clinic practitioners in connection with the litigation, and the tasks performed in connection with this fee motion.
13. As detailed herein and reflected in the attached **Exhibit 1-B**, since September 2023, I, along with two other CWRU attorneys and thirteen Certified Legal Interns (five in Fall 2023 and eight new interns as of January 2024) working under my supervision and at my direction – Attorneys Sara Coulter, Siobhan Gerber, and Certified Legal Interns Patrick Elliott, Brooke White, Hannah Scifres, Jacob Cohen, Nneka Onyekwuluje, Tyler O'Neal, Alec Bashein, Will Baker, Trey

Quillin, Karina Pantoja, Kaley Elliott, Simon Peter Mizner, Taylor Ronnebaum)¹ have provided legal services to Chris Martin the above-captioned case.

14. The time entries reflected in **Exhibit 1-B** were generated using a practice-management application called Clio Manage, into which attorneys and Certified Legal Interns enter their time entries and billing narratives on a regular basis. See <https://www.clio.com/manage/>
15. As part of Mr. Martin's attempts to resolve this matter and in connection with Mr. Martin's fee petition, I reviewed all of the time entries attributable to this matter in Clio to determine whether they were reasonably necessary to meet Mr. Martin's legal needs in this matter.
16. I believe that all of the work performed by First Amendment Clinic attorneys and Certified Legal Interns was necessary and reasonable for the litigation of Mr. Martin's claims in the above-captioned matter.
17. Notably, not all of these timekeepers worked on this matter at the same time, and our time entries reflect time we've removed as duplicative or observational. In the exercise of billing discretion, I have removed 13 hours of attorney time and 184 hours of Certified Legal Intern time, leaving 193 attorney hours and 210 Certified Legal Intern hours for which we are seeking reimbursement (for a total of 403 hours). The discretionary hours deductions include time involved in substituting the Spring 2024 Certified Legal Interns for the 2023 Fall Certified Legal Interns and time spent researching the constitutionality of the City's January 2024 public comment policies, among additional discretionary deductions. Except for the period between the Fall 2023 and Spring 2024 Semesters (approximately December 1, 2023 – January 8, 2024), much of the substantive work in this matter was primarily completed by Certified Legal Interns at lower rates than the attorneys in this matter.
18. Attorneys and Certified Legal Interns log time spent working on matters to specific matters within Clio. These entries do not include any of the time spent evaluating or training in group meetings, individual meetings, or in our weekly Clinic Seminar; students track that time separately under a "Student Time" matter. Attorneys do not bill to client matters class time or time spent evaluating or reflecting with students.
19. All of the legal services provided to Chris Martin in connection with the above-captioned case were provided on a no-fee, pro bono basis. Per his agreement with the Clinic, Mr. Martin is responsible for reasonable costs associated with the litigation.

¹ The First Amendment Clinic is not seeking fees for Nneka Onyekwuluje, Trey Quillin, Karina Pantoja, Kaley Elliott, and Taylor Ronnebaum.

20. In my role as the Director of the First Amendment Clinic, I supervise the work of the Clinic's attorneys and Certified Legal Interns, and oversee all litigation matters that First Amendment Clinic attorneys and Certified Legal Interns are involved in. As required by Ohio Gov. Bar R. II, I have assumed all professional responsibility to each case that I assign to Certified Legal Interns, and I have a duty to provide the Certified Legal interns with "the opportunity to engage in and observe the practice of law," "discuss and counsel the intern regarding matters of professional responsibility that arise," and "train and supervise the legal intern on matters assigned to the intern by that supervising attorney to the extent necessary to properly protect the interests of the client and to properly advance and promote the intern's training." Gov. Bar R. II, Section 7(A) and (B).
21. I have been practicing law for more than 13 years. During that time, my practice has focused primarily on litigation matters. The last 7 years of my practice has been dedicated in substantial part to First Amendment matters. I have represented clients at trial and appeals, including as lead trial counsel in a First Amendment civil rights case in this federal district, and in actions in the Ohio appellate courts and the United States Court of Appeals for the Sixth Circuit. A true and accurate copy of my resume is attached as **Exhibit 1-C**.
22. I graduated from Case Western Reserve University School of Law in 2010, where I served as the Editor-in-Chief of the *Case Western Reserve University Journal of Law, Technology & the Internet*.
23. Prior to joining Case Western Reserve University School of Law in 2017, I was an associate at the Beachwood, Ohio law firm of Singerman, Mills, Desberg & Kauntz (2014-2017), an associate at the Cleveland, Ohio law firm of Mansour, Gavin, Gerlack & Manos (2012-2014), a staff attorney in the Cleveland office of Baker Hostetler LLP (2011-2012), and a staff attorney at the Cleveland Metropolitan Bar Association (2010-2011). Since December 2019, I have been Of Counsel at the Pattakos Law Firm, LLP, a Fairlawn, Ohio-based civil rights firm where my practice is limited to select First Amendment matters.
24. While at the Cleveland Metropolitan Bar Association from 2010-2011, I worked on matters enforcing the Rules of Professional Conduct on behalf of the CMBA's Certified Grievance Committee, including matters alleging attorney respondents violated their ethical duties by charging clearly excessive fees prohibited by Prof. Cond. R. 1.5. *See Cleveland Metro. Bar Ass'n. v. Axner*, 135 Ohio St. 3d 241 (Ohio 2013); see also *Cleveland Metro. Bar Assn. v. Brown*, 143 Ohio St.3d 333, 2015-Ohio-2344.
25. While at Mansour, Gavin, Gerlack & Manos from 2012-2014, I worked on § 1983 civil rights cases in this district, representing governmental defendants in *Teodecki v. Litchfield Twp.*, N.D. Ohio No. 1:11-cv-2737, *Hurd v. Polverine, et al.*, N.D. Ohio No. 1:12-cv-02037, and others.

26. While at Singerman, Mills, Desberg & Kauntz, I worked primarily on real estate and business civil litigation, but still handled some 1983 civil rights matters, including *Meldon v. Village of Chagrin Falls* (Ohio C.P., Cuyahoga Cty., No. 16-CV-866473; N.D. Ohio No 1:16-cv-02085).
27. While at the Pattakos Law Firm LLP, I served as lead counsel in a First Amendment censorship matter involving forum/viewpoint discrimination issues and requests for preliminary injunctive relief regarding government censorship of a university-leased sculptural work in *Billie Lawless v. Cleveland State University*, N.D. Ohio No. 1:19-cv-00178.
28. Among other things, under my leadership, since 2020 First Amendment Clinic attorneys and interns have secured two reported decisions in civil rights cases this Circuit: *Koger v. Mohr*, 964 F.3d 532 (6th Cir. 2020) and *Wood v. Eubanks*, 25 F.4th 414 (6th Cir. 2022), and tried a case to judgment in this district (*Koger v. Mohr*, N.D. Ohio No. 4:17-cv-02409).
29. We have recovered attorneys' fees in two § 1983 cases in United States District Courts, both of which were settled prior to the filing of a fee motion. In *Wood v. Eubanks* we recovered \$29,750 from six Clark County, Ohio Sheriffs' Deputies for successfully arguing the appeal in the Sixth Circuit, and in *Lambert v. Columbiana County, et al.* we recovered \$32,000 (shared pro rata with co-counsel, attorneys at the Reporters Committee for Freedom of the Press) from individual defendants associated with Columbiana County and the City of East Palestine, Ohio.
30. I have been the lead litigator on several other matters involving the City of Cleveland, including as Counsel of Record in the Supreme Court of Ohio in *State ex rel. Standifer v. City of Cleveland*, 170 Ohio St. 3d 367, 2022-Ohio-3711, 213 N.E.3d 665, successfully challenging the City's across-the-board denials of Cleveland Division of Police use-of-force reports under Ohio's Public Records Act. I was also the lead litigator in two other public records cases against the City: *State ex rel. Ideastream Public Media, et al. v. Cleveland et al.*, and *State ex rel. Dissell v. Cleveland*.
31. The First Amendment Clinic has also represented clients in the Cleveland Municipal Court, Cuyahoga Court of Common Pleas, Athens County Court of Common Pleas, Erie County Court of Common Pleas, the Ohio Eighth District Court of Appeals, and the Supreme Court of Ohio.
32. Sara E. Coulter is a Senior Fellow at the First Amendment Clinic. She joined the First Amendment Clinic as a Fellow in April 2021 and was promoted to Senior Fellow in June 2023. Before joining the First Amendment Clinic, Ms. Coulter was an Assistant Attorney General at the Ohio Attorney General's Office, first in the Antitrust section and then in the Major Litigation section. Ms. Coulter is a 2017 graduate of the Moritz College of Law at the Ohio State University, where she graduated *cum laude* as a member of the Order of Barristers. She is a member in

good standing of the Ohio bar, and is admitted to the United States District Court for the Northern District of Ohio, the United States District Court for the Southern District of Ohio, and the United States Court of Appeals for the Sixth Circuit, where she argued the case *Wood v. Eubanks*, 25 F.4th 414 (6th Cir. 2022). A true and accurate copy of Ms. Coulter's resume is attached as **Exhibit 1-D**.

33. As a Senior Fellow in the First Amendment Clinic, Ms. Coulter supervises students representing clients in state and federal litigation, including asserting civil rights claims under Section 1983, defamation matters, public records litigation, and pre-litigation counseling of clients. Since joining the Clinic in 2021, Ms. Coulter has trial and appellate experience in First Amendment matters, including successfully arguing in the United States Court of Appeals for the Sixth Circuit to overturn a District Court's grant of qualified immunity in a § 1983 case alleging First Amendment violations. *Wood v. Eubanks*, 25 F.4th 414 (6th Cir. 2022).
34. Siobhan Gerber is a Fellow in the First Amendment Clinic. She joined the First Amendment Clinic in September 2023. She previously served as a judicial law clerk for the Honorable J. Philip Calabrese at the United States District Court for the Northern District of Ohio, and for the Honorable Eric Clay at the United States Court of Appeals for the Sixth Circuit. Ms. Gerber is a 2021 graduate of the Washington University School of Law, where she graduated *magna cum laude* as a member of the Order of the Coif. She served as an Editor on the Washington University Law Review, and a student intern in the Washington University School of Law First Amendment Clinic. She is a member in good standing of the Ohio bar and is admitted to the United States District Court for the Northern District of Ohio and the United States Court of Appeals for the Sixth Circuit. A true and accurate copy of Ms. Gerber's resume is attached as **Exhibit 1-E**.
35. As a Fellow in the First Amendment Clinic, Ms. Gerber supervises students representing clients in state and federal litigation, including asserting civil rights claims under § 1983 and defamation matters.
36. While attorneys and Certified Legal Interns at the First Amendment Clinic provide legal services to their clients on a no-fee, pro bono basis, the Clinic seeks to recover the value of those services and any litigation costs expended by the Clinic when available under applicable law. See generally, Gov. Bar R. II § 6 ("[a] law school clinic, legal aid bureau, public defender's office, or other legal services organization may be awarded attorney fees for services rendered by the legal intern consistent with the Ohio Rules of Professional Conduct and as provided by law.").
37. For fee-recovery purposes, attorneys at the Clinic use rates as dictated by applicable law. In civil rights cases in the Northern District of Ohio, based on my understanding of the law, that rate is keyed to the market.

38. In attempting to set an appropriate market rate this matter, I have consulted with other First Amendment attorneys in the Northern District of Ohio, including those who have supplied Declarations regarding the fees in this matter.
39. I also researched, and directed our team in research, regarding recent fee-shifting cases in First Amendment matters in the Northern District of Ohio over the last several years as cited in Martin's Motion for Attorneys' Fees.
40. I also reviewed publicly available resources regarding current market rates in Ohio, especially in light of the recent inflationary period and its impact on market rates for legal services. *See generally*, Andrew Maloney, [Inflation May Be Beating Billing Rates Increases](https://www.law.com/americanlawyer/2022/10/12/billing-rate-increases-have-significantly-slowed-even-as-inflation-took-off), *The American Lawyer*, (Oct. 12, 2022) <https://www.law.com/americanlawyer/2022/10/12/billing-rate-increases-have-significantly-slowed-even-as-inflation-took-off> ("Although the consumer price index has increased about 14% since the end of 2019, average law firm rates have increased by about 11% during that time span, according to a separate report from the legal tech company Clio.").
41. According to our Practice Management Software's data, Ohio civil rights lawyers charge an average hourly rate of \$392. *See* Clio.com, [How much should I charge as a lawyer in Ohio?](https://www.clio.com/resources/legal-trends/compare-lawyer-rates/oh/) available at <https://www.clio.com/resources/legal-trends/compare-lawyer-rates/oh/> (summarizing data from 2023 Legal Trends Report, available at <https://www.clio.com/resources/legal-trends/compare-lawyer-rates/oh/>).
42. Based on my understanding of the relevant case law, fee applications submitted in other cases in federal district courts in Ohio, and my overall familiarity with rates charged by counsel in complex First Amendment litigation, I believe the rates reflected in our billing ranging from \$200 for students, \$250 for fellows with fewer than 5 years experience, \$300 for senior fellows for fewer than 10 years experience, and \$475 for attorneys with over 10 years experience are comparable to – and indeed, lower than – those charged by attorneys with similar skill and experience in the Cleveland metropolitan area.

I verify under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on March 20, 2024.

/s/ Andrew Geronimo
Andrew Geronimo



THE MILTON AND CHARLOTTE KRAMER LAW CLINIC

OFFICE POLICIES AND PROCEDURES MANUAL FOR LEGAL INTERNS 2023-2024

The Policies and Procedures Manual contains important information about the operation of the Milton and Charlotte Kramer Law Clinic (the “Clinic”) and your responsibilities as a legal intern. It is your professional obligation to read this Manual and to follow the policies and procedures of the Clinic. You may direct any questions or concerns to your Supervisor or to Sarah Polly.



TIMEKEEPING

Timekeeping and time management are important skills for the legal practitioner. Now is the time to begin focusing on and practicing these skills. All time requirements include class preparation and attendance, meetings with your professor, travel to and from courts or crime scenes, and client representation activities.

Everything you do on a Clinic case or project should be entered on the “Time” tab for the case in Clio. The time you keep track of consists of three broad components:

1. Actual case/project work (*i.e.*, interviewing, legal research, factual investigation, trial preparation);
2. Administrative work (*i.e.*, background legal research to familiarize oneself with an area of law, law office administration); and
3. Seminar sessions.

The purpose of this protocol is to teach you how to keep track of time spent on an individual case for the purpose of billing and receiving payment in accordance with the Rules of Professional Conduct.

Each student is also assigned a Clio Matter for non-client-related time keeping, which is listed by your name followed by the description “(Student Time).” All time spent during seminar sessions, prep time for seminars, and any other non-client-related activities should be entered under the Time Tab for that matter in Clio. Do not enter case-related time under your Student Time matter. If you have any questions about where time should be noted, ask your supervisor.

As you begin working on your cases, you will be engaged in various activities. These will include in-person, Zoom, or telephone meetings or conversations with your supervisor, clients, prosecutors, members of a board of directors, witnesses, and opposing counsel. Other work you do on the case will include reviewing case-related materials, making telephone calls, doing legal research, analyzing facts and law, preparing for hearings, drafting documents, etc. Your entries under the Time Tab should contain an ongoing listing of all of your activities on the case, chronologically as the case progresses, with the most recent entries at the top of the screen.

There should be a single time entry for each separate activity on the case. For example, if you met with your client the night before to prepare for a hearing, that meeting should be reflected in a single time entry. Then, if you went to court the following morning, enter that event as a separate time entry. If you did one type of activity on a single day, but it was broken up by phone calls or other interruptions, you can combine that entire activity into a single time entry for that day. For example, if you spent three hours researching a legal issue over the course of the day but in the interim had two telephone calls on different cases and a lunch break, combine the research into a single time entry, and make separate time entries for each of the separate phone calls.

There is no limit on the length of each time entry. It should be as long as it needs to be. At a minimum, each Time entry should contain:

1. The date and time of the contact;
2. The type of contact or activity;
3. The names of those present or involved in the contact;
4. The location (e.g., at court, at someone's office, at home, in the Clinic);
5. The substance of the contact;
6. The nature of any follow-up needed; and
7. The time spent on the activity (in minutes or hours).

TASKS

During your supervisory meetings, interns and supervisors will generate a list of activities that need to be accomplished in order to advance your client's case. Your supervisor may choose to use the Tasks tab in Clio.

Task tracking will provide specific guidance and direction for your activities and discussions for the following week(s). At each weekly meeting, you and your supervisor will discuss progress on completing the tasks and will generate new tasks to be completed.

BOX

Box is our web-based electronic document management system. We use it to store case-related documents, with designated folders in each matter for drafts (E-Draft) and finalized (E-Final) documents.

Legal interns have limited access (generally read-only) to E-Final, and Editor (create, edit, move, view) access to E-Draft.

To access Box, go to cwru.box.com and log in using your Case Clinic (i.e., jdoe-lawclinic@case.edu and your Clinic assigned password, **not** your regular CWRU login and password) credentials at the Single Sign-On (SSO) prompt. Note: *If you have already logged in to your Clinic webmail via SSO, that authentication should carry over to your Box session, and you may not need to log in again.*

Because the SSO authentication carries over, you will likely encounter issues if you try to log in to your regular CWRU student Gmail account and your Clinic Gmail/Box accounts in the same browser session. We recommend that you use different browser sessions for these different accounts.

SUMMARY

Timekeeper	Years Experience	Hourly Rate	Non-billable Hours	Billable Hours	Cost
Andy Geronimo	14	475	1.1	95.4	\$45,315.00
Sara Coulter	7	300	3.3	33.93333333	\$10,180.00
Siobhan Gerber	3	250	9.433333333	63.88333333	\$15,970.83
			13.83333333	193.2166667	\$71,465.83
Brooke White	Certified Legal Intern	200	11.33333333	43.65	\$8,730.00
Hannah Scifres	Certified Legal Intern	200	17.45	30.2	\$6,040.00
Jacob Cohen	Certified Legal Intern	200	13.4	19.08333333	\$3,816.67
Patrick Elliott	Certified Legal Intern	200	9.6	25.38333333	\$5,076.67
Alec Bashein	Certified Legal Intern	200	15.6	27.41666667	\$5,483.33
Simon Peter Mizn	Certified Legal Intern	200	16.13333333	4.583333333	\$916.67
Trey Quillin	Certified Legal Intern	200	34.9	0	\$0.00
Tyler O'Neal	Certified Legal Intern	200	6.883333333	27.43333333	\$5,486.67
William Baker	Certified Legal Intern	200	7.3	32.03333333	\$6,406.67
Kaley Elliott	Certified Legal Intern	200	38.4	0	\$0.00
Karina Pantoja	Certified Legal Intern	200	13.26666667	0	\$0.00
			184.2666667	209.7833333	\$41,956.67
Totals:			198.1	403	
					Attorneys' Fees
					\$113,422.50
					Costs
					\$7,127.00
					TOTAL
					\$120,549.50

ATTORNEYS

Date	Non-billable	Billable	Activity category	Description	User
9/25/2023			0.7 TC - Telephone call with client	Review of messages (incl. video) from potential client.	Andrew Geronimo
9/26/2023		1.5		Meet with Sara, Siobhan re: client inquiry to discuss research and potential claims and assign tasks to students	Andrew Geronimo
9/27/2023		0.5 TC - Telephone call with client		Prepare for / conduct telephone call with potential client (w/ Sara, Siobhan, Brooke) re: representation and working with Certified Legal Interns.	Andrew Geronimo
9/28/2023		1 LR - Legal research		Research applicable law re: public comment policies.	Andrew Geronimo
9/28/2023		1 MS - Strategy Meeting(other than with client)		Meeting with all team members to discuss matter and strategy and prepare for client call.	Andrew Geronimo
9/28/2023		0.8 DL - Letters, faxes or emails		substantive feedback on BW's draft letter to potential Defendants, including addressing PE/BW discussions re: scope of potential claims	Andrew Geronimo
10/2/2023		0.9		Review B. White case law research; follow-up on cases	Andrew Geronimo
10/3/2023	1.1			Attention to engagement letter and emailing to Mr. Martin	Andrew Geronimo
10/3/2023		0.2		review j. cohen factual research re: council meetings	Andrew Geronimo
10/4/2023		0.4		Review H. Scifres email to client; discuss strategy	Andrew Geronimo
10/4/2023		0.2		Email to Fellows & Interns re status updates and next steps	Andrew Geronimo
10/4/2023		0.5		Review & revise B. White demand letter & P. Elliott comments; assign enclosure email	Andrew Geronimo

10/4/2023	0.8	Review H. Scifres draft Complaint / B. White comments	Andrew Geronimo
10/4/2023	0.2	receipt & review client emails with city officials	Andrew Geronimo
10/6/2023	0.8	Meet with Interns & Fellows to review and revise B. White introductory email to City; discuss approval w client	Andrew Geronimo
10/10/2023	1	Prepare for & attend meeting with team & client; review client emails following meeting	Andrew Geronimo
10/12/2023	2.5	Discuss status of matter and division of work with S. Coulter / S. Gerber; meet with N. Onyekwuluje, P. Elliott re gathering facts & research and to discuss strategies; update all other interns via email	Andrew Geronimo
10/13/2023	2.7	Prepare for and attend Clinic team meeting with Law Director Griffin, Attorneys Scalish, Melnyk, Aston; update client and discuss next steps	Andrew Geronimo
10/16/2023	0.8	Meet with N. Onyekwuluje, S. Coulter, S. Gerber re: confirmation email to Law Director Griffin	Andrew Geronimo
10/30/2023	3.1	Review and revise student work product re: substantive memo to City; accompanying research re: legal issues; comments to students & request meeting	Andrew Geronimo
10/30/2023	0.3	review & respond to P. Elliott email summarizing 10/30 council meeting	Andrew Geronimo
11/1/2023	0.4	receipt & review of client email re: edits to settlement memo with Cit	Andrew Geronimo
11/1/2023	1	prepare for & attend meeting with client re: working with city on public comment policy	Andrew Geronimo
11/2/2023	0.4	Receipt and review of client edits to substantive memo to City; discuss with team	Andrew Geronimo
11/10/2023	0.2	Receipt and review of Council Caucus meeting emails, plan next steps with team	Andrew Geronimo
11/12/2023	0.8	Receipt and review of new proposed public comment policies; research re: new included language; coordinate with team	Andrew Geronimo
11/13/2023	3.5	Attend City Council Caucus meeting to hear councilors talk about proposed public comment policies; discuss strategy with client/team	Andrew Geronimo
11/20/2023	0	Follow-up email to interns re: next steps, requests to review/submit work product	Andrew Geronimo
11/23/2023	0.2	Review B. White notes from Council meeting; email re: strategy / next steps	Andrew Geronimo
11/23/2023	0.8	Meet with S. Coulter, S. Gerber re: settlement/litigation strategy	Andrew Geronimo
11/24/2023	0.8	Draft email to students / email to fellows proposing division of labor for preparing Complaint, TRO motion	Andrew Geronimo
11/25/2023	1.5	Review of B. White research / draft on First Amendment analyses of public comment periods; feedback and direction for further research	Andrew Geronimo
11/26/2023	4.8	Review and revise Complaint and TRO Motion	Andrew Geronimo
11/26/2023	0.3	Email to Client enclosing work product and discussing strategy	Andrew Geronimo
11/27/2023	1	Discuss / send Email to Attorney Scalish re: Councilor Jones attempts to speak with our team / request for update on policy	Andrew Geronimo
11/30/2023	1.2	Receipt and review of Law Director Griffin's response email to Scalish email; fwd to client & discuss	Andrew Geronimo
12/2/2023	2	Review and revise Complaint following revisions / strategy discussions / S. Gerber & S. Coulter edits	Andrew Geronimo
12/3/2023	0.4	Attention to press release in response to press inquiries & review S. Gerber draft / draft email to client	Andrew Geronimo
12/4/2023	1.5	Meet with S. Gerber / S. Coulter re: finalizing and submitting Complaint and Temporary Restraining Order; Attention to filing Complaint	Andrew Geronimo
12/4/2023	0.2	Email to Law Director Griffin with service copies of Complaint	Andrew Geronimo

12/5/2023	0.5	Attention to reviewing service waiver and enclosing email to Law Director Griffin of same	Andrew Geronimo
12/5/2023	0.6	Respond to press inquiries about matter;	Andrew Geronimo
12/12/2023	0.7	Review & respond to client email re: press coverage of controversy; review of press coverage and Defendants' statements	Andrew Geronimo
12/18/2023	2.8	Attention to filings; meet with S. Coulter, S. Gerber to discuss edits/division of work	Andrew Geronimo
12/19/2023	1.3	Meet with S. Coulter / S. Gerber to discuss client edits to TRO motion	Andrew Geronimo
12/19/2023	2.5	review and revise TRO Motion	Andrew Geronimo
12/19/2023	0.5	prepare for and attend meeting with S. Gerber re: Martin injunction/filings/research	Andrew Geronimo
12/20/2023	1.5	Attention to finalizing TRO Motion	Andrew Geronimo
12/20/2023	1.3	Service of TRO Motion; Contacting Court chambers per ECF to advice of filing; emails to opposing counsel re: TRO hearing timing	Andrew Geronimo
12/20/2023	0.6	prepare for and attend meeting with S. Coulter re: injunction filings/timing/relief/strategy	Andrew Geronimo
12/21/2023	0.8	Receipt & review of Court's Order re: TRO briefing / stipulations; discuss w S. Coulter / S. Gerber; fwd to client	Andrew Geronimo
12/21/2023	0.2	Email to Attorneys Menzalora, Russell, Aumann re: meet and confer	Andrew Geronimo
12/29/2023	1.6	Follow-up emails to Attorneys Russell, Aumann, Menzalora re: meet and confer obligations; schedule meeting and circulate Zoom & inform client and Spring 24 students	Andrew Geronimo
1/2/2024	0.9	Meeting with S. Coulter, S. Gerber to prepare for status conference / TRO hearing, discuss dividing assignments between new team of students	Andrew Geronimo
1/3/2024	2.5	Prepare for and attend meet-and-confer with S. Coulter, S. Gerber, T. O'neal, J.R. Russell, M. Aumann; attention to drafting & circulating stipulated order	Andrew Geronimo
1/3/2024	0	Review City edits to stipulated TRO; discuss with S. Coulter; S. Gerber; email to client to set up meeting	Andrew Geronimo
1/3/2024	0.4	Receipt and review of City's Notice re: TRO; Email to Attorney Russell re: lack of agreement on material issues and pending deadline for City's response; email to client re same	Andrew Geronimo
1/3/2024	0.8	Prepare for and attend Meeting with Spring 24 Intern T. O'Neal re: status of case and assignments going forward	Andrew Geronimo
1/4/2024	0.7	Receipt and review of J. Russell email re: filing/stipulations; discuss with S. Coulter, S. Gerber, client	Andrew Geronimo
1/4/2024	4	Prepare for and attend telephonic status conference with Court; revise TRO per Court's instructions; review City's edits and response emails and forward to client	Andrew Geronimo
1/5/2024	0.5	Meet with S. Coulter re: filing stipulated TRO: confer with Client and team	Andrew Geronimo
1/5/2024	0.4	Response to media inquiries re: litigation	Andrew Geronimo
1/18/2024	0.2	Check in on T. O'Neal progress on TRO Reply	Andrew Geronimo
1/18/2024	1.7	Attention to finalizing/sending settlement demand	Andrew Geronimo
1/19/2024	0.6	Review & minor suggestions/edits to S. Gerber draft Reply section	Andrew Geronimo
1/21/2024	1	Review of purported proposed policies; email to 24 Spring interns re: strategy and specifics of new policy	Andrew Geronimo
1/22/2024	2.1	Meet with students / fellows re: fact updates and strategy	Andrew Geronimo
1/22/2024	1.5	Watch City Council meeting re: vote on updated rules; correspondence with team re: same	Andrew Geronimo

1/23/2024	0.4	Review of Notice of Supplemental Evidence & send to client / team	Andrew Geronimo
1/23/2024	1.2	Receipt and review of R. 68 Offer of Judgment; discuss with team	Andrew Geronimo
1/23/2024	0.1	Review T. Oneal email to client	Andrew Geronimo
1/25/2024	2.5	Meet with Fellows/Interns to discuss how policy changes / offer of judgment affect litigation	Andrew Geronimo
1/27/2024	0.6	Work with clerk re: corrections to civil cover sheet filing	Andrew Geronimo
2/8/2024	0.8	Attention to settlement demand letter	Andrew Geronimo
2/8/2024	1	Review W. Baker / A. Bashein draft fee petition; provide substantive feedback to structure, facts, law sections	Andrew Geronimo
2/12/2024	0.5	Receipt and review of M. Aumann email attaching purported discovery requests	Andrew Geronimo
2/14/2024	0.8	Research re: propriety of post-judgment discovery prior to the filing of a fee petition;	Andrew Geronimo
2/14/2024	0.8	Begin drafting potential response re: City's post-judgment discovery	Andrew Geronimo
2/14/2024	1.2	Prepare for and attend meeting with S. Gerber, A. Bashein, W. Baker re: attorneys' fees, fee petition, areas of subsequent research identified in Defendants' response	Andrew Geronimo
2/14/2024	0.5	Receipt and review of J.R. Russell email re: settlement of attorneys' fees; research re: Defendants' "cost-plus" theory of recoverability	Andrew Geronimo
2/14/2024	0.4	Draft and send emails to civil rights attorneys requesting declarations in support of fees	Andrew Geronimo
2/14/2024	0.1	Research re: recovery for time spend briefing fee petitions;	Andrew Geronimo
2/14/2024	0.4	Receipt and review of Russell letter re: settlement offer of \$2,940;	Andrew Geronimo
2/15/2024	2.2	Attention to affidavits in support of fee petition	Andrew Geronimo
2/15/2024	1.5	Research cases and propositions cited/referenced in Russell 2/14/24 letter re: reasonableness of fees; addl research re: reasonable rates and hours	Andrew Geronimo
2/16/2024	0.2	L/M for potential expert re: fee petition	Andrew Geronimo
2/20/2024	0.5	Telephone conference with S. Gerber, potential declarant for fee petition	Andrew Geronimo
2/20/2024	0.7	Attention to Draft of 2nd demand counter correspondence	Andrew Geronimo
2/21/2024	1.2	Prepare for/attend Telephone conferences S. Gerber, A. Bashein, W. Baker, potential declarant re: fee-shifting and declarations	Andrew Geronimo
2/21/2024	0.5	Further attention to 2nd Settlement Demand correspondence	Andrew Geronimo
3/13/2024	1.7	Attention to finalizing and sending third settlement offer and response objection to Cleveland discovery requests.	Andrew Geronimo
3/14/2024	0.1	Left message for J.R. Russel to discuss 3/13 correspondence and associated issues.	Andrew Geronimo
3/15/2024	0.1	Left second message for J.R. Russel to discuss 3/13 correspondence and associated issues.	Andrew Geronimo
3/18/2024	0.8	telephone conferences with fee declarant about declaration supporting fee petition	Andrew Geronimo
3/19/2024	1.5	Attention to finalizing fee motion	Andrew Geronimo
TOTALS:	1.1	95.4	

Date	Non-billable	Billable	Activity category	Description	User
9/28/2023		1.25	Meeting - Internal	Internal team meeting over Zoom to discuss strategy and next steps; listening in on call with reporter during meeting.	Sara Coulter
10/3/2023		0.966666667	Meeting - Internal	Internal team meeting to discuss feedback on drafts and next steps.	Sara Coulter

10/3/2023	0.433333333	DD - Drafting/editing/reviewing documents other than court papers	Review of draft correspondence and discussion re: same.	Sara Coulter
10/6/2023	0.866666667	DD - Drafting/editing/reviewing documents other than court papers	Review and finalize letter to City Council Legal Counsel. Review and draft emails re: same.	Sara Coulter
10/13/2023	0.316666667	Meeting - External	Meeting with legal team and Cleveland City Council attorneys (Mark Griffin, Patricia Aston, Rachel Scalish, and Stephanie Melnyk) to discuss CWRU First Amendment Clinic's letter.	Sara Coulter
10/13/2023	0.35	Meeting - Internal	Team debrief after call with Cleveland legal team. Discussion of next steps.	Sara Coulter
10/13/2023	0.283333333	Meeting - External	Call to client re: meeting with Cleveland legal team.	Sara Coulter
12/3/2023	0.466666667		Reviewed complaint and associated documents and emails re: same.	Sara Coulter
12/4/2023	0.55		Watched livestream of public comment during Cleveland City Council meeting.	Sara Coulter
12/4/2023	2.5		Reviewed and finalized complaint and related documents; filed same.	Sara Coulter
12/5/2023	0.433333333		Reviewed and edited waiver of service cover letter and forms; attention to rules re: same.	Sara Coulter
12/6/2023	1.166666667		Legal research re: service of process and injunctive relief.	Sara Coulter
12/6/2023	0.733333333		Watched remainder of Dec. 4 city council meeting.	Sara Coulter
12/7/2023	0.666666667		Editing Motion for Temporary Restraining Order/Preliminary Injunction/Other Equitable Relief.	Sara Coulter
12/18/2023	0.8		Draft email response to court and brief internal zoom re: same.	Sara Coulter
12/18/2023	0.666666667		Draft proposed order for TRO/PI.	Sara Coulter
12/18/2023	1.1		Reviewed and edited TRO/PI.	Sara Coulter
12/19/2023	1.333333333		Internal zoom re: review of motion for injunctive relief and next steps.	Sara Coulter
12/19/2023	1.5		Reviewing and editing accompanying docs for TRO/PI.	Sara Coulter
12/19/2023	0.8		Attention to edits to doc accompanying TRO/PI motion and emails to client re: same.	Sara Coulter
12/20/2023	4.166666667		Reviewed, edited and filed TRO/PI and accompanying docs. Internal Zoom meetings and Zoom with client.	Sara Coulter
1/3/2024	0.816666667		Internal Zoom meeting with Attys Gerber & Geronimo & Intern O'Neal re: background on case & strategy for meet & confer with City Council attys.	Sara Coulter
1/3/2024	0.416666667		Zoom meet & confer with Cle City Council Attys Russell & Aumann. Brief call with client for authority.	Sara Coulter
1/3/2024	0.833333333		Drafting joint TRO based on meet & confer and circulating to client & opposing counsel for review.	Sara Coulter
1/4/2024	0.266666667		Status conference w/ the Court.	Sara Coulter
1/4/2024	0.033333333		Call to City Council attorneys following status conference. Left VM.	Sara Coulter
1/4/2024	1.816666667		Internal discussion of next steps following status conference and call with Council attys. Revised and circulated updated TRO.	Sara Coulter
1/4/2024	0.133333333		Call with Cle City Council attys re: next steps.	Sara Coulter
1/5/2024	0.783333333		Drafting a proposal for constitutional public comment policies.	Sara Coulter
1/5/2024	1		Reviewing and internally discussing Council atty's revisions to draft stipulated TRO; drafting response and call with client.	Sara Coulter
1/8/2024	0.433333333		Review of client's draft proposal and comparison to Clinic's draft proposal.	Sara Coulter
1/8/2024	0.4		Internal discussion re: Cleveland City Council Cmte discussion of public comment; policy revisions.	Sara Coulter
1/8/2024	0.5		Watching public comment portion of City Council meeting.	Sara Coulter
1/9/2024	0.266666667		Watching portion of City Council chairs cmte mtg where public comment is discussed.	Sara Coulter

1/9/2024	0.13333333	Attention to client emails	Sara Coulter
1/11/2024	0.4	Reading 11th Circuit case McDonough v. Garcia et al. re: forum analysis.	Sara Coulter
1/11/2024	0.8	Internal discussions re: next steps and division of labor among students. Call with client re: proposals.	Sara Coulter
1/11/2024	0.76666667	Comparing different drafts of proposed public comment policy and creating one draft.	Sara Coulter
1/12/2024	0.2	Reviewing draft settlement letter	Sara Coulter
1/17/2024	1.45	Discussion re: Defendants' filing and next steps with Attys Geronimo and Gerber.	Sara Coulter
1/17/2024	1.75	Internal meeting with Certified Legal Interns & Attys Geronimo & Gerber re: Defs' Opposition, Reply, case updates, and next steps.	Sara Coulter
1/18/2024	1	Internal Zoom with client and legal team re: draft policy proposal and next steps.	Sara Coulter
1/18/2024	0.28333333	Internal Zooms with legal team re: client meeting & proposed policy.	Sara Coulter
1/18/2024	0.16666667	Updated Motion to Permit Legal Externs to participate.	Sara Coulter
1/18/2024	0.3	Reviewed client's redlines to proposed public comment policy and emails re: same.	Sara Coulter
1/18/2024	0.93333333	Reviewed final edits to proposed public comment policy and settlement letter; internal meetings with Attys Geronimo and Gerber re: finalizing and sending settlement demand.	Sara Coulter
TOTALS:	3.3	33.93333333	

Date	Non-billable	Billable	Activity category	Description	User
9/28/2023	1.25		Meeting - Internal	Team meeting to discuss next steps to advance the matter; listening to phone call with a reporter	Siobhan Gerber
10/3/2023		0.95	Meeting - Internal	Team meeting to review draft correspondence; with Andy, Sara, Patrick, Brooke, and Jake	Siobhan Gerber
10/6/2023		0.83333333	DD - Drafting/editing/reviewing documents other than court papers	Reviewing and finalizing letter and email correspondence to Cleveland Chief Legal Counsel	Siobhan Gerber
10/12/2023		0.95	MS - Strategy Meeting(other than with client)	Meet with Andy, Sara, Nneka, and Patrick regarding strategy	Siobhan Gerber
10/13/2023		0.4	Meeting - External	Phone call with City of Cleveland Law Director and other City attorneys to discuss our client's position regarding Council's public comment policy	Siobhan Gerber
10/16/2023		1	DL - Letters, faxes or emails	Drafted email correspondence to send to Mark Griffin and other City attorneys; communicated with Chris Martin to obtain his approval of the draft email correspondence; met with Andy, Sara, Patrick, and Nneka to finalize and send the email	Siobhan Gerber
11/1/2023		1.2	Meeting - Internal	Meeting with Sara, Andy, Jacob, Brooke, Hannah to discuss feedback from client and revisions to anticipated external communications	Siobhan Gerber
11/1/2023	0.8		TC - Telephone call with client	Attended a phone call with Chris, with Sara, Hannah, Jake, Nneka, Patrick, and Brooke	Siobhan Gerber
11/25/2023		0.36666667	MS - Strategy Meeting(other than with client)	Telephone call with S. Coulter and A. Geronimo re: legal strategy	Siobhan Gerber
11/29/2023		1	DC - Drafting/editing/reviewing court papers other than briefs	Reviewed and cite checked draft TRO motion	Siobhan Gerber
11/30/2023		0.88333333	DC - Drafting/editing/reviewing court papers other than briefs	Reviewed, proofread the complaint	Siobhan Gerber
12/4/2023			DG - Drafting/editing/reviewing documents other than court papers	Prepared waiver of service cover letter and form addressed to Blaine Griffin; prepared and filed summons addressed to City Council and Blaine Griffin	Siobhan Gerber

12/5/2023	0.5	FR - Factual research	Watching relevant portions of the livestream of the 12/5/2023 City Council meeting, including the public commenters and remarks by Councilmembers Spencer and Slife.	Siobhan Gerber
12/5/2023		0.7	Prepared a waiver of service packet to send to Blaine Griffin; attention to R. 4(d) Waiver of Service	Siobhan Gerber
12/6/2023		1.2 LR - Legal research	Researched filing for a preliminary injunction and service of process	Siobhan Gerber
12/7/2023		DM - Drafting/editing/reviewing legal memos 1.6 (briefs/motions)	Reviewing and editing the factual background of the brief in support of the TRO/PI motion	Siobhan Gerber
12/12/2023	2.6	FM - File maintenance	Reviewing and expanding semester transition memo; adding links to relevant internal documents and external websites	Siobhan Gerber
12/13/2023	0.366666667	DL - Letters, faxes or emails	Attention to R. 4; drafting email response to Bill Menzalora re: waiver of service	Siobhan Gerber
12/13/2023		0.1 FM - File maintenance	Reviewing and uploading to Box Defendant Blaine Griffin's executed waiver of service	Siobhan Gerber
12/13/2023	0.3	FR - Factual research	Watching 12-12-2023 Sound of Ideas program discussing the Martin case	Siobhan Gerber
12/13/2023		DM - Drafting/editing/reviewing legal memos 7.1 (briefs/motions)	Researching case law and drafting motion for TRO/PI; attention to ND Ohio local rules	Siobhan Gerber
12/14/2023		0.1 DL - Letters, faxes or emails	Read Client's email re: his interview with Spectrum News; watched Spectrum News report	Siobhan Gerber
12/18/2023		DM - Drafting/editing/reviewing legal memos 0.9 (briefs/motions)	Reviewing and editing draft TRO/PI motion	Siobhan Gerber
12/19/2023	0.633333333	Meeting - Internal	Zoom meeting with Andy and Sara to discuss most recent edits to TRO/PI motion; reviewing the TRO/PI motion	Siobhan Gerber
12/19/2023		0.2 DL - Letters, faxes or emails	Emailed Client draft TRO/PI motion for his review	Siobhan Gerber
12/20/2023	2		Zoom meeting with Client re: filing of TRO/PI motion; internal Zoom meeting with Andy and Sara re: the same; proofreading TRO/PI motion	Siobhan Gerber
1/2/2024		0.1 DL - Letters, faxes or emails	Attention to Client email and City Council newsletter mentioning public comment	Siobhan Gerber
1/3/2024	0.433333333	Meeting - External	Zoom meet & confer with Cle City Council attys. Brief call with client for authority.	Siobhan Gerber
1/3/2024		0.8 Meeting - Internal	Zoom call with Andy, Sara, and Intern Tyler O'Neal to explain case background and discuss strategy for upcoming meet & confer and status conference	Siobhan Gerber
1/4/2024		0.3 CO - In court (other than trials)	Status conference	Siobhan Gerber
1/4/2024	0.133333333	Meeting - External	Phone call with Cle City Council attys re: next steps following the status conference with the Court	Siobhan Gerber
1/4/2024		2 Meeting - Internal	Internal discussion re: strategy and next steps following status conference and discussion with Cle City Council attys; revised and edited draft stipulated TRO	Siobhan Gerber
1/4/2024		DM - Drafting/editing/reviewing legal memos 0.9 (briefs/motions)	Drafting a proposed stipulated TRO based on the meet & confer with Cle City Council attys; circulating draft to Client and opposing counsel	Siobhan Gerber
1/5/2024		1 Meeting - Internal	Discuss Cle City Council atty's revisions to the draft stipulated TRO; draft response to the revisions; brief call with Client	Siobhan Gerber
1/8/2024		DD - Drafting/editing/reviewing documents other than 1.2 court papers	Attention to Chris's email and proposed public comment policies; reviewing materials relevant to drafting proposed public comment policies	Siobhan Gerber
1/8/2024		0.4 Meeting - Internal	Internal meeting re: Client's proposed public comment policy	Siobhan Gerber
1/9/2024	0.4	FR - Factual research	Watching public comments during 1/8 City Council meeting	Siobhan Gerber
1/9/2024	0.3	FR - Factual research	Listening to portion of City Council chairs committee meeting discussing the public comment policies and the Martin lawsuit	Siobhan Gerber

1/11/2024		0.5 TC - Telephone call with client	Internal meeting re: drafting a proposed public comment policy; telephone call with Client re: the same	Siobhan Gerber
1/11/2024		0.3 LR - Legal research	Reading 11th Circuit case McDonough v. Garcia et al. re: forum analysis.	Siobhan Gerber
1/11/2024		DD - Drafting/editing/reviewing documents other than court papers	Drafting settlement demand letter	Siobhan Gerber
1/12/2024	0.4	DO - Drafting/editing/reviewing other than above-describe	Updating the case transition memo to provide to incoming certified legal interns	Siobhan Gerber
1/12/2024		0.5	Meeting with Andy, Alec, Simon Peter, and Tyler to summarize the state of the matter and assign tasks	Siobhan Gerber
1/16/2024	1.333333333	Meeting - Internal	Meeting with Andy and Interns to review Martin and Lambert cases	Siobhan Gerber
1/16/2024	0.333333333	Meeting - Internal	Meeting with Andy and Simon Peter to discuss settlement demand materials and next steps	Siobhan Gerber
1/16/2024		DM - Drafting/editing/reviewing legal memos	Reading Defendants' opposition to PI motion; creating outline of key arguments to include in the reply brief	Siobhan Gerber
1/17/2024		1.6 (briefs/motions)	Meeting with Andy and Sara to discuss next steps re: reply to Defendants' opposition to the PI motion	Siobhan Gerber
1/17/2024		1.45 Meeting - Internal	Meeting with Andy, Sara, and CLIs to discuss response to Defendants' opp. to PI motion	Siobhan Gerber
1/17/2024		1.75 Meeting - Internal	Sending emails to CLIs assigning tasks related to writing the Reply Br. to Defs' Opp. to the PI Mot.	Siobhan Gerber
1/18/2024		0.5 DL - Letters, faxes or emails	Meeting with Andy, Sara, Simon Peter and the Client to discuss changes to the proposed policy; brief internal meeting to prepare for Client meeting	Siobhan Gerber
1/18/2024	1.333333333	TC - Telephone call with client	Reviewed first drafts of sections of the PI Reply Br. and research memos relating to the Br.; formatted template document for the PI Reply Br.	Siobhan Gerber
1/19/2024		DM - Drafting/editing/reviewing legal memos		Siobhan Gerber
1/19/2024		1 (briefs/motions)		Siobhan Gerber
1/20/2024		DM - Drafting/editing/reviewing legal memos		Siobhan Gerber
1/20/2024		1.8 (briefs/motions)	Reviewing and drafting Reply Br. to Defs. Opp. to PI Mot.	Siobhan Gerber
1/20/2024	0.666666667	DL - Letters, faxes or emails	Responding to email from Tyler re: drafting of PI Reply Br.	Siobhan Gerber
1/21/2024		0.3 DL - Letters, faxes or emails	Assigning portions of the PI Reply Br. to Interns Trey and Kaley	Siobhan Gerber
1/22/2024		2 Meeting - Internal	Meeting with Andy and Sara to discuss Jan. 2024 proposed public comment policies and determine next steps; call with Client re: the same	Siobhan Gerber
1/22/2024		DM - Drafting/editing/reviewing legal memos		Siobhan Gerber
1/22/2024		3 (briefs/motions)	Reviewing and drafting PI Reply Br.; cite checking PI Reply Br.	Siobhan Gerber
1/23/2024	0.4	FR - Factual research	Watching portions of the livestream of the 1/22 City Council meeting	Siobhan Gerber
1/24/2024		DC - Drafting/editing/reviewing court papers other than briefs		Siobhan Gerber
1/24/2024		0.3 briefs	Drafted a joint status report to send to Client and opposing counsel for review	Siobhan Gerber
1/29/2024		2	Downloaded time logs for all billers from the software to an Excel sheet; reviewed the time entries and made initial recommendations on redactions and division between billable and non-billable time	Siobhan Gerber
2/5/2024		0.5	Reviewed fee petition draft prepared by A. Bashein and W. Baker; wrote comments identifying additional legal authorities and arguments to include in the next draft	Siobhan Gerber
2/7/2024		DC - Drafting/editing/reviewing court papers other than briefs	Meeting with A. Geronimo to discuss M. Aumann's insertion of Defendants' position regarding seeking a stay and discovery into the joint status report; revising the joint status report to include Plaintiff's position	Siobhan Gerber
2/7/2024		1.4 briefs	Reviewing M. Aumann's email response to the proposed joint status report objecting to language included in Plaintiff's position; revising the joint status report in response and emailing M. Aumann re: the same	Siobhan Gerber
2/7/2024		0.3 DL - Letters, faxes or emails		Siobhan Gerber

2/7/2024	0.15		Filing the Joint Status Report and the Offer of Judgment and the Acceptance	Siobhan Gerber
2/7/2024		DD - Drafting/editing/reviewing documents other than 0.2 court papers	Reviewed settlement demand letter and made comments for A. Geronimo about the timeline of the litigation	Siobhan Gerber
2/7/2024	1		Created new Excel sheet reflecting only attorney time on the matter; prepared redacted PDF version to include with the settlement demand to opposing counsel	Siobhan Gerber
2/8/2024		DD - Drafting/editing/reviewing documents other than 0.35 court papers	Reviewed and edited settlement demand letter	Siobhan Gerber
2/12/2024		0.4 DL - Letters, faxes or emails	Reviewed Defendants' discovery requests transmitted by email by M. Aumann; meeting with A. Geronimo re: the same	Siobhan Gerber
2/15/2024		DC - Drafting/editing/reviewing court papers other than 0.7 briefs	Reviewed A. Geronimo's declaration re: reasonableness of attorneys' fees, revised and expanded portion describing my credentials	Siobhan Gerber
2/21/2024		DO - Drafting/editing/reviewing other than above- 0.75 describe	Reviewed the summary of the litigation prepared by A. Bashein and W. Baker to send to potential fee experts; revised for clarity and expanded to include some additional events	Siobhan Gerber
2/22/2024		DM - Drafting/editing/reviewing legal memos 2.1 (briefs/motions)	Researching and drafting portion of the attorneys' fee motion regarding the recoverability of attorneys' fees for litigating attorneys' fee issue	Siobhan Gerber
2/22/2024		1.5 LR - Legal research	Researched and reviewed fee petitions, supporting affidavits for fee petitions, and court orders resolving fee petitions in past N.D. Ohio cases	Siobhan Gerber
3/11/2024		3 DM - Drafting/editing/reviewing legal memos (briefs/mo	Edited the fee motion by cite-checking all internal legal citations and adding footnote citations to the Geronimo declaration and fee expert declarations; revised the fee motion to synthesize key arguments and compress the statement of facts to conform the memo to the length requirements of N.D. Ohio L.R. 7.1(f)	Siobhan Gerber
3/12/2024		0.9	Conducted final review of billing entries; created a summary chart of the total numbers of billable and non-billable hours, rates, and fees for each timekeeper	Siobhan Gerber
TOTALS:	9.43333333	63.88333333		

FALL 2023 CERTIFIED LEGAL INTERNS

Date	Non-billable	Billable	Activity category	Description	User
9/27/2023		1.03333333		Initial meeting with Andy, Sara, & Siobhan regarding potential case; phone call with Chris Martin to determine if Martin is interested in litigation	Brooke White
9/28/2023	1.23333333		Meeting - Internal	Meeting to discuss next steps for Chris Martin case, including drafting of the engagement letter, demand letter, complaint, and TRO. During this meeting, Andy returned a report's phone call to discuss the case.	Brooke White
9/28/2023		1.03333333	DD - Drafting/editing/reviewing documents other than court papers	Drafted initial demand letter to Blaine A. Griffin	Brooke White
9/29/2023		0.91666667	Meeting - External	Meeting w/ Chris Martin and other Certified Legal Interns to learn more about what happened on September 25th and discuss possible next steps	Brooke White
10/1/2023		2.05	LR - Legal research	Research 1A cases, focusing on limited public forums & viewpoint discrimination. Cases may be used to support demand letter	Brooke White
10/1/2023		1.08333333	DD - Drafting/editing/reviewing documents other than court papers	Revised and edited demand letter	Brooke White
10/1/2023		0.58333333	LR - Legal research	Researched more cases to determine 3-step 1A analysis	Brooke White

10/3/2023	2.16666667	DD - Drafting/editing/reviewing documents other than court papers	Revise demand letter to create a shorter, initial demand letter entitled "Intro Letter"	Brooke White
10/3/2023	1.5	LR - Legal research	Rewatch Cleveland City Council meetings from 09/25 & 10/03 to incorporate quotes in Intro Letter	Brooke White
10/3/2023	0.91666667	Meeting - Internal	Meeting with Andy, Siobhan, Sara, Patrick & Jake to discuss changes to demand letter	Brooke White
10/4/2023	0.25	DD - Drafting/editing/reviewing documents other than court papers	Drafted e-mail to send to Chris w/ attached Intro Letter	Brooke White
10/4/2023	0.33333333	DL - Letters, faxes or emails	Revised e-mail draft to Chris & downloaded PDF of draft intro letter & included intro letter as attachment in the e-mail	Brooke White
10/4/2023	1.03333333	Meeting - External	Meeting with Chris Martin to discuss sending intro letter to Mark Griffin	Brooke White
10/4/2023	0.5	DO - Drafting/editing/reviewing other than above-describe	Reviewing e-mails from Chris Martin in preparation for 10/04 meeting	Brooke White
10/5/2023	1.01666667	Meeting - Internal	Talked about demand letter w/ Andy, Sara, Patrick & Jake	Brooke White
10/5/2023	0.1	Meeting - Internal	Phone call w/ Andy to talk about revisions to demand letter	Brooke White
10/5/2023	0.33333333	DC - Drafting/editing/reviewing court papers other than briefs	Revised demand letter	Brooke White
10/5/2023	0.58333333	DC - Drafting/editing/reviewing court papers other than briefs	Reviewed & made comments on the Complaint that Hannah drafted	Brooke White
10/6/2023	0.91666667	DG - Drafting/editing/reviewing documents other than court papers	Final review of intro letter + sent it off to recipient	Brooke White
10/9/2023	0.75	Meeting - Internal	Discussed Mark Griffin's response e-mail & scheduled next meeting with Chris to determine next steps	Brooke White
10/9/2023	0.16666667	SOC - Outside of Classroom Assignments/Preparation - Non-case related	Coordinated w/ colleagues to determine best time to contact Chris Martin via phone call on 10/10	Brooke White
10/10/2023	0.33333333	Meeting - External	Call with Chris	Brooke White
10/11/2023	0.25	DD - Drafting/editing/reviewing documents other than court papers	Revised & sent response to Mark Griffin	Brooke White
10/12/2023	0.43333333	Meeting - Internal	Met with Siobhan & Sara re: next steps, and potential Friday call	Brooke White
10/13/2023	0.5	DD - Drafting/editing/reviewing documents other than court papers	Reviewed Chris's e-mail/attachments from this morning	Brooke White
10/13/2023	0.58333333	Meeting - External	Meeting with counsel for Cleveland City Council	Brooke White
10/13/2023	0.33333333	Meeting - Internal	Internal de-brief after meeting w/ Mark Griffin	Brooke White
10/13/2023	0.41666667	TC - Telephone call with client	Follow up call w/ Chris	Brooke White
10/27/2023	1.5	DC - Drafting/editing/reviewing court papers other than briefs	Create skeleton document on memo to send to Mark Griffin and add in my own research/analysis	Brooke White
10/30/2023	1.25	DC - Drafting/editing/reviewing court papers other than briefs	Edit memo to send to Mark Griffin	Brooke White
10/30/2023	0.58333333	DC - Drafting/editing/reviewing court papers other than briefs	Worked with colleagues to make revisions to Mark Griffin memo; added in some edits once my colleagues added in their sections	Brooke White
10/31/2023	0.41666667	DC - Drafting/editing/reviewing court papers other than briefs	Made additional revisions to Mark Griffin memo prior to internal meeting	Brooke White
10/31/2023	0.16666667	DC - Drafting/editing/reviewing court papers other than briefs	Made final changes to Mark Griffin memo and send draft e-mail to attorneys for review	Brooke White
10/31/2023	0.75	Meeting - Internal	Internal meeting w/ team	Brooke White
10/31/2023	0.08333333	DL - Letters, faxes or emails	Drafted revised email to Chris & sent it	Brooke White
11/1/2023	0.25	FR - Factual research	Read Blaine Griffin article in advance of internal meeting	Brooke White
11/1/2023	1.25	Meeting - Internal	Internal meeting in advance of client phone call	Brooke White
11/1/2023	0.25	DG - Drafting/editing/reviewing documents other than court papers	Drafted potential public statement re: case	Brooke White

11/1/2023	0.33333333	Meeting - External	Meeting with Chris (I left early due to class)	Brooke White
11/2/2023	0.5	Meeting - Internal	Meeting to discuss final revisions to memo	Brooke White
11/13/2023	1.03333333	TR - Travel time	Travel time to and from City Hall	Brooke White
11/13/2023	2.25	Meeting - External	Attended Caucus meeting	Brooke White
11/13/2023	2.5	LR - Legal research	Looked up caselaw to determine constitutionality of Council's proposed changes to public comment	Brooke White
11/13/2023	0.75	LR - Legal research	Additional caselaw research	Brooke White
11/22/2023	1.5	FR - Factual research	Revised meeting notes from Caucus meeting and input them in a Word doc; reviewed Tweets from meeting, including looking at people's videos	Brooke White
11/22/2023	1.08333333	Meeting - External	Watched City Council meeting from 11/20	Brooke White
11/25/2023	0.6	Meeting - External	Meeting w/ Chris & Andy	Brooke White
11/25/2023	0.41666667	Meeting - Internal	Meeting w/ Andy regarding next steps ahead of 11/27 caucus meeting	Brooke White
11/25/2023	0.33333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Edited Complaint	Brooke White
11/25/2023	4.08333333	LR - Legal research	Conducted TRO Research and uploaded doc w/ research to Box	Brooke White
11/25/2023	2.21666667	LR - Legal research	Add'tl caselaw research to potentially support Complaint and/or TRO	Brooke White
11/26/2023	0.58333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewed Andy's changes to the Complaint	Brooke White
11/26/2023	0.16666667	FR - Factual research	Looked through media articles to find quotes from council members	Brooke White
11/26/2023	0.43333333	DC - Drafting/editing/reviewing court papers other than briefs	Drafted waiver of service to opposing counsel	Brooke White
11/27/2023	1.93333333	Meeting - External	Attended Cleveland Caucus meeting on 11/27	Brooke White
11/27/2023	1	TR - Travel time	Travel to/from Willoughby to attend Caucus meeting	Brooke White
11/27/2023	0.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewed new version of Complaint	Brooke White
11/27/2023	0.33333333	Meeting - External	Phone call with Chris, Hannah, and Andy before Caucus meeting	Brooke White
11/27/2023	0.58333333	LR - Legal research	Additional forum research	Brooke White
11/27/2023	0.2	DD - Drafting/editing/reviewing documents other than court papers	Review note to opposing counsel	Brooke White
11/27/2023	1.13333333	Meeting - External	Watched public comment from 11/27	Brooke White
11/28/2023	2.08333333	LR - Legal research	Additional public forum research (and sent e-mail to everyone with my conclusions)	Brooke White
11/28/2023	0.2	FR - Factual research	Read Cleveland Scene article from this morning	Brooke White
12/3/2023	0.38333333	DC - Drafting/editing/reviewing court papers other than briefs	Added comments/suggested changes to latest edition of Complaint	Brooke White
TOTALS:	11.33333333	43.65		

Date	Non-billable	Billable	Activity category	Description	User
9/27/2023		0.7	Meeting - Internal	meeting with Andy, Sara, and Siobhan to discuss initial complaint drafting	Hannah Scifres
9/27/2023		0.1	DL - Letters, faxes or emails	drafting classmate email to find a time to meet with Chris Martin	Hannah Scifres
9/27/2023		1.5	DD - Drafting/editing/reviewing documents other than court papers	reviewing and taking notes on 9/25 City Council meeting recording, Ison v Madison Loc. Sch. Dist. Bd. of Educ., and Cleveland City Council Public Comment Guidelines	Hannah Scifres
9/28/2023		0.4	DL - Letters, faxes or emails	drafting and sending email to Chris Martin to find a time for a Zoom meeting to discuss potential representation	Hannah Scifres
9/28/2023		0.3	MHP - Preparation for meeting or hearing (including trial)	preparing questions for 9/29 meeting with Chris Martin	Hannah Scifres

9/29/2023		0.6 LR - Legal research	reviewing demand letter; researching whether prohibitions on addressing individuals during public comment are constitutional	Hannah Scifres
9/29/2023		1 Meeting - External	meeting with Chris Martin to gather initial facts + debrief with Andy, Sara, Siobhan afterwards	Hannah Scifres
10/2/2023	1	Meeting - External	watching 10/2 Cleveland City Council meeting recording and taking notes on discussions of public comment rule changes	Hannah Scifres
10/4/2023		DC - Drafting/editing/reviewing court papers other than 3 briefs	drafting Chris Martin complaint	Hannah Scifres
10/4/2023		1.2 Meeting - External	meeting with Chris Martin to discuss intro letter, next steps, etc.	Hannah Scifres
10/9/2023		0.7 Meeting - Internal	internal meeting to discuss next steps with Law Director Griffin	Hannah Scifres
10/9/2023	0.9	Meeting - External	watching 10/9 Cleveland City Council meeting recording	Hannah Scifres
10/10/2023		0.9 LR - Legal research	reviewing relevant caselaw and developing recommendations for new public comment policy	Hannah Scifres
10/10/2023		0.3 Meeting - External	meeting with Chris to discuss next steps after Law Director Griffin's email	Hannah Scifres
10/12/2023		0.6 LR - Legal research	researching case law regarding challenges to public comment laws	Hannah Scifres
10/12/2023		DC - Drafting/editing/reviewing court papers other than 1.5 briefs	revising TRO and complaint	Hannah Scifres
10/13/2023		1 Meeting - External	meeting with Mark Griffin; post-meeting discussion with Chris (client)	Hannah Scifres
10/16/2023	1.4	Meeting - External	watching 10/16 Cleveland City Council meeting recording	Hannah Scifres
10/18/2023		DC - Drafting/editing/reviewing court papers other than 2 briefs	reviewing comments and making edits on complaint	Hannah Scifres
10/20/2023		DC - Drafting/editing/reviewing court papers other than 0.5 briefs	reviewing TRO and complaint affidavit and adding comments	Hannah Scifres
10/20/2023		DC - Drafting/editing/reviewing court papers other than 0.2 briefs	reviewing comments and making edits on complaint	Hannah Scifres
10/21/2023		1.1 LR - Legal research	researching constitutionality of prohibition of signs/banner/etc. in limited public forums for City Council memo	Hannah Scifres
10/23/2023	1.3	FR - Factual research	watching 10/23 Cleveland City Council meeting	Hannah Scifres
10/25/2023		0.7 LR - Legal research	researching constitutionality of prohibition of signs/banner/etc. in limited public forums for City Council memo	Hannah Scifres
10/25/2023		DC - Drafting/editing/reviewing court papers other than 1.3 briefs	incorporating comments/edits into Chris Martin complaint	Hannah Scifres
10/26/2023	0.1	FR - Factual research	reviewing Chris Martin's Twitter post	Hannah Scifres
10/29/2023		DD - Drafting/editing/reviewing documents other than 0.6 court papers	drafting policy-based arguments in support of allowing signs/banners at City Council meetings	Hannah Scifres
10/30/2023		DD - Drafting/editing/reviewing documents other than 0.3 court papers	drafting policy-based arguments in support of allowing signs/banners at City Council meetings	Hannah Scifres
10/30/2023	1.3	FR - Factual research	watching 10/30 Cleveland City Council meeting	Hannah Scifres
10/31/2023		0.8 Meeting - Internal	meeting to discuss memo to city council	Hannah Scifres
11/1/2023		0.1 FR - Factual research	reviewing IdeaStream article about City Council changing public comment rules	Hannah Scifres
11/1/2023		0.3 FR - Factual research	reviewing Chris Martin's 11/1 email and comments on draft letter to Council	Hannah Scifres
11/1/2023		1.2 Meeting - Internal	internal meeting to prep for 11/1 meeting with Chris	Hannah Scifres
11/1/2023		0.8 Meeting - External	meeting with client to discuss revisions to memo	Hannah Scifres
11/1/2023		0.4 Meeting - Internal	debriefing meeting to discuss next steps after meeting with Chris; dividing up memo edits amongst team	Hannah Scifres
11/1/2023	0.1	DD - Drafting/editing/reviewing documents other than court papers	reviewing 11/1 Andy tweets about Council potentially making it's rules stricter	Hannah Scifres

11/2/2023		DD - Drafting/editing/reviewing documents other than		
11/2/2023		0.7 court papers	making edits on Mark Griffin memo	Hannah Scifres
11/2/2023		0.5 Meeting - Internal	discussing proposed edits to Mark Griffin memo and touching base	Hannah Scifres
11/3/2023		DD - Drafting/editing/reviewing documents other than	drafting and sending email to Mark Griffin with public comment recommendations	
11/3/2023		0.5 court papers	memo	Hannah Scifres
11/13/2023		DD - Drafting/editing/reviewing documents other than		
11/13/2023		0.4 court papers	catching up on Chris' emails and reviewing proposed new public comment rules	Hannah Scifres
11/13/2023	2	Meeting - External	Rules Committee City Council Caucus meeting observation and debriefing with Chris afterward	Hannah Scifres
11/13/2023	0.75	TR - Travel time	traveling to and from the City Council Caucus meeting on 11/13	Hannah Scifres
11/14/2023	1		watching 11/13 city council meeting recording	Hannah Scifres
11/20/2023	1.2	FR - Factual research	watching 11/20 Cleveland city council meeting	Hannah Scifres
11/22/2023	0.5	DG - Drafting/editing/reviewing documents other than		
11/22/2023	0.5	court papers	adding notes from 11/13/23 caucus meeting to Box	Hannah Scifres
11/27/2023		0.3 Meeting - External	brief call with Chris to touch base and plan next steps	Hannah Scifres
11/27/2023	0.8	TR - Travel time	travel time to and from city council caucus meeting	Hannah Scifres
11/27/2023	2.5	Meeting - External	11/27 city council caucus meeting and debrief	Hannah Scifres
11/27/2023		0.3 Meeting - Internal	debrief city caucus meeting and discussing next steps with Andy, Sara, Siobhan	Hannah Scifres
11/27/2023	1.1	FR - Factual research	watching 11/27 city council meeting recording	Hannah Scifres
11/27/2023		DD - Drafting/editing/reviewing documents other than		
11/27/2023		0.3 court papers	reviewing draft email to Rachel Scalish 11/27	Hannah Scifres
11/27/2023		DC - Drafting/editing/reviewing court papers other than		
11/27/2023		1.5 briefs	reviewing TRO and making edits	Hannah Scifres
11/28/2023		DC - Drafting/editing/reviewing court papers other than		
11/28/2023		1.3 briefs	reviewing TRO and making edits	Hannah Scifres
12/3/2023		DC - Drafting/editing/reviewing court papers other than		
12/3/2023		0.3 briefs	reviewing latest draft of Chris Martin complaint	Hannah Scifres
12/4/2023	1.5	FR - Factual research	watching 12/4 Cleveland city council meeting	Hannah Scifres
TOTALS:	17.45	30.2		

Date	Non-billable	Billable	Activity category	Description	User
9/28/2023		1.583333333		Introductory zoom meeting with the team. Post zoom I familiarized myself with what a supporting affidavit looks like and FRCP 65.	Jacob Cohen
9/28/2023		0.25		Brainstormed questions for zoom tomorrow.	Jacob Cohen
9/29/2023		1.25		Zoom with Chris and discussion with team afterwards about it.	Jacob Cohen
10/2/2023		1.866666667		Went back through notes of interview with Chris. Began writing a very rough draft of a potential supporting affidavit.	Jacob Cohen
10/3/2023		1		Zoom call regarding demand letter.	Jacob Cohen
10/4/2023	1.566666667			Watched the City Council meeting from 9/25 and 10/2	Jacob Cohen
10/4/2023		2.166666667		Zoom call. Worked on supporting affidavit. Reviewed relevant case law.	Jacob Cohen
10/5/2023		1		Zoom call about demand letter and tro.	Jacob Cohen
10/5/2023		0.85		Worked on TRO legal standard analysis.	Jacob Cohen
10/9/2023		0.666666667		Zoom regarding how to follow up to Mark Griffin's email.	Jacob Cohen
10/10/2023	1.333333333			Watched city council meeting from previous night. Researched relevant case law to public comment	Jacob Cohen
10/10/2023		0.666666667		Zoom call with Chris then follow up convo with Siobhan.	Jacob Cohen
10/11/2023	0.05			Checked notifications on box and reviewed the email to be sent to Mark Griffin.	Jacob Cohen
10/12/2023		0.8		Researched relevant case law towards public comment.	Jacob Cohen

10/12/2023	0.183333333	Addressed comments to TRO on Box.	Jacob Cohen
10/13/2023	1.083333333	Call with Mark Griffin and follow up with Chris.	Jacob Cohen
10/17/2023	0.633333333	Watched last night's Cleveland City Council meeting.	Jacob Cohen
10/18/2023	0.383333333	Added suggestions to the supporting affidavit that I discussed with Andy, Sara, and Siobhan.	Jacob Cohen
10/22/2023	0.716666667	Public comment rules memo.	Jacob Cohen
10/24/2023	0.533333333	Watched City Council meeting from 10/23/23	Jacob Cohen
10/26/2023	0.333333333	Attempted to figure out how to screenshot city council public comment rules to put them in supporting affidavit. Did not work. Will attempt again.	Jacob Cohen
10/30/2023	0.5	Updated and added my section for the memo to Mark Griffin.	Jacob Cohen
10/31/2023	1.866666667	Watched city council meeting from previous night and had zoom to discuss memo for mark griffin.	Jacob Cohen
10/31/2023	0.166666667	Drafted email to send to Siobhan, then sent actual email to Chris.	Jacob Cohen
11/1/2023	0.083333333	Read new blaine griffin article.	Jacob Cohen
11/1/2023	0.166666667	Read Chris's manifesto and memo suggestions.	Jacob Cohen
11/1/2023	1.166666667	Zoom call to discuss new developments with public comment and upcoming zoom with Chris.	Jacob Cohen
11/1/2023	1.216666667	Zoom with Chris and the team.	Jacob Cohen
11/1/2023	0.316666667	Revisions to pre-registration on the memo.	Jacob Cohen
11/2/2023	0.5	Zoom call about revisions to the memo.	Jacob Cohen
11/13/2023	2.166666667	Attended city council Caucus meeting.	Jacob Cohen
11/15/2023	0.733333333	Worked on Complaint.	Jacob Cohen
11/21/2023	0.616666667	Watched last night's city council meeting.	Jacob Cohen
11/27/2023	2.666666667	Attended caucus meeting at city hall.	Jacob Cohen
11/27/2023	0.733333333	Reviewed changes to TRO, complaint, and supporting affidavit.	Jacob Cohen
11/29/2023	0.666666667	watched city council meeting from 11/27	Jacob Cohen
TOTALS:	13.4	19.083333333	

Date	Non-billable	Billable	Activity category	Description	User
9/26/2023		1.166666667	Meeting - Internal	Meeting with team to get intial information and assignments on Chris Martin matter. Reviewed video from council meeting and getting first assignment.	Patrick Elliott
9/26/2023		0.333333333	LR - Legal research	Initial reading and review of Ison case	Patrick Elliott
9/27/2023	0.75		DD - Drafting/editing/reviewing documents other than court papers	Drafting initial version of client engagement letter.	Patrick Elliott
9/28/2023	0.25		DD - Drafting/editing/reviewing documents other than court papers	Review of edits and revisions to client engagement letter for Chris Martin	Patrick Elliott
9/29/2023		1.333333333	Meeting - External	Initial client zoom meeting with Chris Martin. Discussed notes and other matters with team afterwards.	Patrick Elliott
10/2/2023	1.083333333		Hearing - Administrative	Observed Cleveland City Council meeting via their livestream.	Patrick Elliott
10/3/2023		1	Meeting - Internal	Meeting with team to discuss demand letter. Assigned to watch through old council comments for facts relating to our issue	Patrick Elliott
10/3/2023		1.25	FR - Factual research	Reviewing old city council public comments and taking notes on instances where individuals were allowed to speak despite prima facie violations of council comment rules	Patrick Elliott
10/4/2023		1.583333333	DC - Drafting/editing/reviewing court papers other than briefs	Beginning first draft of success on merits section for potential TRO	Patrick Elliott
10/5/2023		1	Meeting - Internal	Zoom meeting with team to discuss demand letter	Patrick Elliott

DC - Drafting/editing/reviewing court papers other than					
10/5/2023		1.5	briefs	Continuing first rough draft of success on merits section of TRO	Patrick Elliott
10/6/2023		0.833333333	Meeting - Internal	Meeting with part of team after class to review intro letter before sending final version to Mark Griffin	Patrick Elliott
10/9/2023		0.333333333	Meeting - Internal	Meeting with Andy and Siobhan on drafting a response to client after receiving information from City Law Director.	Patrick Elliott
10/9/2023		0.333333333	DL - Letters, faxes or emails	Drafting email to client about future meeting concerning strategy and information received from City Law Director	Patrick Elliott
10/9/2023	1		Hearing - Administrative	Observed Cleveland City Council meeting online	Patrick Elliott
10/10/2023		0.666666667	Meeting - External	Meeting with client briefly to talk strategy and next steps. Brief internal discussion after.	Patrick Elliott
10/13/2023		0.583333333	Meeting - External	Meeting with Cleveland City Law Director and Special Counsel for City Council. Discussed public comment rules and their future.	Patrick Elliott
10/13/2023		0.666666667	TC - Telephone call with client	Debriefed after teams call with City law department. Placed call with client afterwards to discuss the meeting and steps moving forward.	Patrick Elliott
10/13/2023			1 LR - Legal research	Completed research regarding application of public comment restrictions across federal courts. Briefed and added case to our ongoing list of authority.	Patrick Elliott
10/13/2023		0.25	DL - Letters, faxes or emails	Reviewing and responding to email from client about meeting with law director and potential matter related to Cleveland PD	Patrick Elliott
10/16/2023		0.6		Meeting to discuss sending reply to Mark Griffin concerning 10/13 teams call. Sent emails keeping client in loop with letter to Griffin.	Patrick Elliott
10/16/2023	1.333333333		Hearing - Administrative	Observes Cleveland city council meeting	Patrick Elliott
10/18/2023		0.283333333	DO - Drafting/editing/reviewing other than above-describe	Reviewing and suggesting edits for new draft of complaint	Patrick Elliott
10/23/2023		3.516666667	LR - Legal research	Legal research on topics registered for speaking in limited public fora	Patrick Elliott
10/23/2023			DM - Drafting/editing/reviewing legal memos (briefs/motions)	Memo on pre registration topics for public comment	Patrick Elliott
10/23/2023	1.15		Meeting - External	Observe Cleveland City Council meeting	Patrick Elliott
10/30/2023		0.75	DO - Drafting/editing/reviewing other than above-describe	Editing and compiling topic into memo for Mark Griffin	Patrick Elliott
10/30/2023	1.2		Meeting - External	Observed Cleveland City Council Meeting	Patrick Elliott
10/30/2023	0.666666667		DM - Drafting/editing/reviewing legal memos (briefs/motions)	Wrote internal memo of summary of 10/30 City Council meeting	Patrick Elliott
10/31/2023		0.666666667	Meeting - Internal	Internal team zoom about Mark Griffin memo	Patrick Elliott
11/1/2023		1.25	Meeting - External	Meeting with client about memo to send Mark Griffin	Patrick Elliott
11/2/2023		0.5	Meeting - Internal	Team meeting to discuss edits to Mark griffin memo	Patrick Elliott
11/2/2023			DO - Drafting/editing/reviewing other than above-describe	Finalizing edits to mark griffin memo	Patrick Elliott
11/2/2023		0.333333333		Discussion with fellows and email to Chris with edited version of memo	Patrick Elliott
11/13/2023	1.166666667		Meeting - External	Observed Cleveland city council meeting	Patrick Elliott
11/20/2023	1		Meeting - External	Cleveland city council meeting	Patrick Elliott
11/21/2023		1.833333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Editing fact section of complaint for 9/25 meeting	Patrick Elliott
TOTALS:	9.6	25.38333333			

SPRING 2024 CERTIFIED LEGAL INTERNS

Date	Non-billable	Billable	Activity category	Description	User
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1/11/2024	1.5	DO - Drafting/editing/reviewing other than above-describe	Reading news articles, tweets, the injunction, and the complaint about the Chris Martin.	Alec Bashein
1/12/2024	0.5	Meeting - Internal	Meeting on Martin case	Alec Bashein
1/15/2024	1.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewing cases within the injunction motion.	Alec Bashein
1/16/2024	1.25	Meeting - Internal	More about the Chris Martin case, went over the defense's opposition motion.	Alec Bashein
1/17/2024	1.76666667	Meeting - Internal	Meeting to discuss reply to defense's opposition motion.	Alec Bashein
1/17/2024	1	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewed cases in depth on defense's opposition motion.	Alec Bashein
1/18/2024	4.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Drafting a standing reply	Alec Bashein
1/20/2024	1	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Researching Cleveland City policies	Alec Bashein
1/22/2024	0.5	Meeting - Internal	Meeting about motion to reply and called with client	Alec Bashein
1/23/2024	0.41666667	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewing final draft of reply brief	Alec Bashein
1/24/2024	1.75	Meeting - Internal	Meeting of over Offer of Judgment	Alec Bashein
1/30/2024	1	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Research for fees motion and writing affidavit	Alec Bashein
1/31/2024	3.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Writing for brief of attorney fee awards draft	Alec Bashein
2/7/2024	1.5	Meeting - Internal	Meeting over attorney's fees motion	Alec Bashein
2/7/2024	2		Legal fees motion edits- legal research	Alec Bashein
2/8/2024	1.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Writing legal fees motion	Alec Bashein
2/12/2024	2		Attorney's fees motion research, editing, and writing.	Alec Bashein
2/13/2024	1.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Editing and drafting the attorney's fees motion	Alec Bashein
2/14/2024	1.33333333	Meeting - Internal	Meeting over attorney's fees motion	Alec Bashein
2/15/2024	2.33333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Legal research and writing for fees motion	Alec Bashein
2/15/2024	1	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Drafting and researching work done before complaint	Alec Bashein
2/19/2024	0.75	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Drafting and researching section for enhancement	Alec Bashein
2/21/2024	1.43333333	Meeting - External	Meeting for fee affidavit	Alec Bashein
2/21/2024	0.66666667	DC - Drafting/editing/reviewing court papers other than briefs	Timeline for attorneys to use for affidavits	Alec Bashein
2/27/2024	0.16666667	Meeting - External	Meeting with client	Alec Bashein
2/27/2024	0.98333333	Meeting - Internal	Meeting for settlement call, strategy, and client counseling	Alec Bashein
2/27/2024	0.33333333	Meeting - External	Settlement discussions	Alec Bashein
2/29/2024	0.33333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewing the new motion for attorney fees	Alec Bashein
2/29/2024	1.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Researched and drafted issue of policy behind fee award and nominal damages	Alec Bashein
3/4/2024	0.5	DC - Drafting/editing/reviewing court papers other than briefs	Reviewed affidavit examples	Alec Bashein
3/7/2024	1.33333333	DC - Drafting/editing/reviewing court papers other than briefs	Drafting affidavit	Alec Bashein

3/8/2024	0.41666667	DC - Drafting/editing/reviewing court papers other than briefs	Reviewed the affidavit	Alec Bashein
3/15/2024	0.75	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewing the fee motion	Alec Bashein
3/18/2024	0.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Reviewing legal fees motion	Alec Bashein
TOTALS:	15.6	27.41666667		

Date	Non-billable	Billable	Activity category	Description	User
1/11/2024		0.5	FR - Factual research	Reviewed news articles discussing case to become familiar with facts.	Simon Peter Mizner
1/12/2024		0.5	Meeting - Internal	Discussed assignments and case.	Simon Peter Mizner
1/16/2024		2	Meeting - Internal	Discussed assignments and strategy for semester.	Simon Peter Mizner
1/17/2024			1 DL - Letters, faxes or emails	Drafted email to client regarding demand letter, reviewed demand letter and proposed public comment policy.	Simon Peter Mizner
1/17/2024		1	FR - Factual research	Watched video of council meeting, reviewed complaint	Simon Peter Mizner
1/17/2024	1.75		Meeting - Internal	Discussed case assignments, upcoming client meeting, and Defendant's brief in opposition.	Simon Peter Mizner
1/17/2024		0.25	DL - Letters, faxes or emails	Drafted and sent email to client about proposed comment policy and scheduled meeting with him.	Simon Peter Mizner
1/18/2024		1.25	Meeting - External	Reviewed proposed public comment policy with Chris and team via Zoom.	Simon Peter Mizner
1/18/2024	0.41666667		FR - Factual research	Reviewed documents in docket	Simon Peter Mizner
1/18/2024	0.08333333		SB - Student background work	Read emails from Chris and opposing counsel.	Simon Peter Mizner
1/21/2024	0.33333333		FR - Factual research	Reviewed emails and reviewed status of case.	Simon Peter Mizner
1/21/2024	1.5		FR - Factual research	Watched previous city council meeting videos.	Simon Peter Mizner
1/22/2024		0.66666667	Meeting - Internal	Prepared for and met with Chris to discuss Council's proposed new public comment rules.	Simon Peter Mizner
1/22/2024	0.08333333		Meeting - Internal	Checked in with Andy, Sarah, and Siobhan to see if there was anything that needed immediately addressed in case.	Simon Peter Mizner
1/22/2024	1.11666667		FR - Factual research	Watched video of previous Council meeting.	Simon Peter Mizner
1/22/2024	0.86666667		FR - Factual research	Watched Council meeting.	Simon Peter Mizner
1/23/2024	1		FR - Factual research	Reviewed record and previous filings.	Simon Peter Mizner
1/23/2024		0.25	Meeting - Internal	Met with Andy, Sara, and Siobhan to talk about email to opposing counsel.	Simon Peter Mizner
1/23/2024	0.33333333		LR - Legal research	Reviewed internal memos on legal issues in case.	Simon Peter Mizner
1/23/2024	0.5		LR - Legal research	Reviewed memos on legal issues.	Simon Peter Mizner
1/24/2024		0.66666667	Meeting - Internal	Prepared for and met with Andy to discuss Defendant's offer of judgment.	Simon Peter Mizner
1/24/2024	1.08333333		FR - Factual research	Watched previous City Council meetings.	Simon Peter Mizner
2/14/2024	1.11666667		SB - Student background work	Watched Council meeting video.	Simon Peter Mizner
2/15/2024	1		SB - Student background work	Watched Council meeting video.	Simon Peter Mizner
2/27/2024		0.33333333	Meeting - External	Called opposing council to discuss settlement.	Simon Peter Mizner
2/27/2024		0.16666667	Meeting - External	Called Chris to tell him about call with opposing council.	Simon Peter Mizner
2/27/2024	0.95		Meeting - Internal	Met with team to discuss Martin.	Simon Peter Mizner
TOTALS:	16.13333333	4.58333333			

Date	Non-billable	Billable	Activity category	Description	User
1/17/2024		1.7		Met w/ group to discuss Reply Brief to the Defendant's opposition to the PI Motion in the Martin matter.	Trey Quillin
1/20/2024		3.8		Conducted background research on the case and past case law.	Trey Quillin

1/21/2024	3.4		Researched the issue of indecent or discriminatory for reply brief.	Trey Quillin
1/21/2024	3.1		Researched and wrote draft of reply brief concerning indecent and discriminatory comment ban.	Trey Quillin
1/23/2024	1.1		Prepared the email for the joint draft status to opposing counsel.	Trey Quillin
1/25/2024	6.2		Prepared draft on TRO for specific analysis.	Trey Quillin
2/2/2024	4.2	CA - In Court (Appellate Argument)	Analyzed the case background subsequent to the Lowery decision.	Trey Quillin
2/3/2024	5.6		Researched and wrote a memo describing the constitutional implications of cases concerning City Council policy.	Trey Quillin
2/6/2024	0.7		Discussed the Status Report concerning Martin and the necessary updates needed. Sat in on phone call with opposing counsel.	Trey Quillin
2/6/2024	0.4		Sent the email concerning the Plaintiff's acceptance of Defendant's Offer of Judgment.	Trey Quillin
2/6/2024	3.3		Compiled the joint status report with the updates to the case.	Trey Quillin
2/6/2024	0.4		Prepared the email to send with the joint status report to opposing counsel.	Trey Quillin
2/6/2024	0.7		participated in call where changes to the draft of the joint status report was discussed.	Trey Quillin
2/16/2024	0.3		Wrote email to Chris Martin updating him on the latest settlement communication from the City.	Trey Quillin
TOTALS:	34.9	0		

Date	Non-billable	Billable	Activity category	Description	User
12/20/2023		0.25	FR - Factual research	Read email from Professor Geronimo on Martin case and read news articles concerning the case.	Tyler O'Neal
12/27/2023	0.183333333		FR - Factual research	Reread Cleveland.com article "Man cut off at Cleveland City Council's microphone files First Amendment lawsuit against council, President Blaine Griffin"	Tyler O'Neal
12/27/2023	0.1		FR - Factual research	Reread Ideastream.org article "Cleveland resident whose microphone was cut during public comment sues City Council"	Tyler O'Neal
12/27/2023	0.083333333		FR - Factual research	Reread Cleveland Scene article "Clevelander Files Federal Lawsuit Against City Council Alleging Public Comment Policies Are Unconstitutional"	Tyler O'Neal
12/27/2023	0.183333333			Read federal court (USNDOH) complaint filing on behalf of Chris Martin	Tyler O'Neal
12/27/2023	0.083333333		FR - Factual research	Read letter sent by clinic to Cleveland City Council	Tyler O'Neal
12/27/2023	0.183333333			Read motion for injunction filed with federal court.	Tyler O'Neal
12/27/2023	0.083333333		FR - Factual research	Looked at docket for case	Tyler O'Neal
1/3/2024	1.083333333		Meeting - Internal	Had meeting with Professors Geronimo, Coulter, and Gerber to discuss questions about Martin case	Tyler O'Neal
1/3/2024		0.5	Meeting - External	Meet and Confer with City of Cleveland (including phone call with client to confer)	Tyler O'Neal
1/3/2024		0.183333333	Meeting - Internal	Conducted follow-up call with client after conclusion of meet and confer.	Tyler O'Neal
1/3/2024		0.433333333	DC - Drafting/editing/reviewing court papers other than briefs	Observed drafting of order enjoining parties in lieu of TRO (proposed agreed order) which was then sent to Chris Martin.	Tyler O'Neal
1/3/2024		0.233333333	Meeting - Internal	Discussed case with Professors Geronimo, Coulter, and Gerber	Tyler O'Neal
1/4/2024		0.433333333		Read through email traffic in preparation of attending status conference call with Judge Fleming	Tyler O'Neal
1/4/2024		0.233333333	Meeting - Internal	Spoke about issues to address with city and attempted to call the city's counsel.	Tyler O'Neal
1/4/2024		0.133333333	Meeting - External	City's counsel called back; discussed briefing schedule and press release to communicate that city will not enforce rules.	Tyler O'Neal

1/4/2024	0.283333333	Meeting - Internal	Listened to call with Chris to communicate what happened in status conference and in call with opposing counsel.	Tyler O'Neal
1/4/2024	0.483333333	Meeting - External	Further discussed case with Professors after call with Mr. Martin.	Tyler O'Neal
1/4/2024	0.4	DC - Drafting/editing/reviewing court papers other than briefs	Observed drafting of new proposed TRO and email to send to opposing counsel.	Tyler O'Neal
1/12/2024	0.933333333	Meeting - Internal	Spoke with Professor Geronimo and Ms. Gerber about case and assignments.	Tyler O'Neal
1/16/2024	0.633333333	DC - Drafting/editing/reviewing court papers other than briefs	Read City's Opposition Brief and Mazzolini Affidavit on Court Docket.	Tyler O'Neal
1/16/2024	0.183333333	0.183333333 briefs	Began drafting response memorandum to city's opposition brief.	Tyler O'Neal
1/17/2024	1.8	Meeting - Internal	Prepared for and attended meeting with Professors Geronimo, Coulter, and Gerber and Alec (also Will, Trey, Karina, and Simon Peter) to discuss response memo.	Tyler O'Neal
1/18/2024	1.583333333	DC - Drafting/editing/reviewing court papers other than briefs	Worked on drafting succeeding on the merits section of response memo.	Tyler O'Neal
1/18/2024	2.933333333	DC - Drafting/editing/reviewing court papers other than briefs	Worked on drafting succeeding on the merits section of response memo	Tyler O'Neal
1/18/2024	3.833333333	DC - Drafting/editing/reviewing court papers other than briefs	Worked on drafting succeeding on the merits section of response memo and sent status email to Professors.	Tyler O'Neal
1/19/2024	0.75	DC - Drafting/editing/reviewing court papers other than briefs	Continued work on draft response memo (likelihood of success on merits)	Tyler O'Neal
1/20/2024	4.25	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Continued research and writing of likelihood of success on the merits section of response brief	Tyler O'Neal
1/21/2024	1.183333333	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Continued research and writing of likelihood of success on the merits section of response brief. Revised portions of brief.	Tyler O'Neal
1/22/2024	0.75		Proofread synthesized response brief. Participated in discussion about synthesized brief with Professors Geronimo, Coulter, and Gerber.	Tyler O'Neal
1/22/2024	0.15	FR - Factual research	Looked at new rules for public comment on Cleveland City Council's website and looked at votes in tonight's meeting (unanimous)	Tyler O'Neal
1/23/2024	0.933333333	Meeting - External	Watched 1/22/2024 Cleveland City Council meeting to see passage of new policy on public comment period.	Tyler O'Neal
1/23/2024	0.383333333	DL - Letters, faxes or emails	Received emails from Professor Geronimo about Notice of Mootness and Offer of Judgment from City. Read documents and drafted email to send to client containing documents for his records.	Tyler O'Neal
1/23/2024	0.933333333	Meeting - External	Watched 1/22/2024 Cleveland City Council meeting to see passage of new policy on public comment period.	Tyler O'Neal
1/23/2024	0.383333333	DL - Letters, faxes or emails	Received emails from Professor Geronimo about Notice of Mootness and Offer of Judgment from City. Read documents and drafted email to send to client containing documents for his records.	Tyler O'Neal
1/24/2024	1.35	MS - Strategy Meeting(other than with client)	Held meeting to discuss advice to client concerning offer of judgment in light of new public comment policy.	Tyler O'Neal
1/24/2024	0.05	DC - Drafting/editing/reviewing court papers other than briefs	Helped in drafting joint status extension request and emailed request to city asking for two weeks to consider newly proposed policy and offer of judgment.	Tyler O'Neal
1/24/2024	0.233333333	MS - Strategy Meeting(other than with client)	Participated in further discussion of offer of judgment prior call with Chris Martin.	Tyler O'Neal
1/24/2024	0.1	TC - Telephone call with client	Sat in on brief call with Chris Martin to talk about offer.	Tyler O'Neal
1/24/2024	0.05	SB - Student background work	Listened to Councilman Polensek voicemail sent to clinic from client.	Tyler O'Neal

1/24/2024	0.05	DL - Letters, faxes or emails	Received response email from city concerning suggested two-week. Read the email. Received second email from Siobhan asking me to stop by and respond to city after my class. Responded to Siobhan's email.	Tyler O'Neal
1/24/2024	0.183333333		Drafted and sent email to City accepting their edits to Joint Status Report. Sent follow-up email to Chris Martin of agreed to JSR.	Tyler O'Neal
1/26/2024	0.183333333	SB - Student background work	Listened to podcast sent by client discussing case.	Tyler O'Neal
1/30/2024	1.133333333	SB - Student background work	Watched video of Cleveland City Council's 1/29/24 meeting.	Tyler O'Neal
1/31/2024	0.083333333	TC - Telephone call with client	Listened to telephone call to discuss options with client pertaining to offer of judgment.	Tyler O'Neal
2/6/2024	0.533333333	Meeting - Internal	Zoom call to discuss developments in Martin case.	Tyler O'Neal
2/6/2024	0.1	DL - Letters, faxes or emails DC - Drafting/editing/reviewing court papers other than	Drafted and sent email to Chris Martin telling him we plan to send the Notice of Acceptance unless he tells us otherwise.	Tyler O'Neal
2/7/2024	0.15	briefs	Read various drafts of JSV and emails exchanged. Read final JSV filed with court.	Tyler O'Neal
2/8/2024	0.1	SB - Student background work DD - Drafting/editing/reviewing documents other than	Watched Cleveland City Council meeting from February 5, 2024 to see President Griffin's comments on decorum.	Tyler O'Neal
2/8/2024	0.083333333	court papers	Read settlement demand attorneys fee statement..	Tyler O'Neal
2/12/2024	0.133333333	DC - Drafting/editing/reviewing court papers other than		
2/12/2024	0.133333333	briefs	Read Discovery Requests and Interrogatories from Opposing Counsel	Tyler O'Neal
2/14/2024	0.05	DL - Letters, faxes or emails	Read email from city concerning offer for attorney fees.	Tyler O'Neal
2/27/2024	0.1	DD - Drafting/editing/reviewing documents other than court papers		
2/29/2024	0.083333333	DL - Letters, faxes or emails	Read Re: Defendants' Post-Judgment Discovery Requests in Martin v. Griffin	Tyler O'Neal
2/29/2024	0.133333333	DD - Drafting/editing/reviewing documents other than court papers	Read email from Chris Martin about intended comments in upcoming City Council meeting.	Tyler O'Neal
3/1/2024	0.583333333	TC - Telephone call with client	Read new settlement communication sent to city.	Tyler O'Neal
3/2/2024	0.083333333		Participated in phone call with Chris Martin to discuss his planned statement at next City Council meeting	Tyler O'Neal
3/4/2024	0.05	DO - Drafting/editing/reviewing other than above- describe	Read Plaintiff's Responses to Defendant's Discovery Questions document.	Tyler O'Neal
3/5/2024	0.083333333	SB - Student background work	Read Chris Martin's revised draft of City Council comments for tonight's meeting.	Tyler O'Neal
3/5/2024	0.3	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Watched Youtube video of Chris Martin's comment at Cleveland City Council Meeting on March 4, 2024.	Tyler O'Neal
3/5/2024	0.333333333	SB - Student background work	Read email from Professor Geronimo to city about motion for certified legal interns to participate and read city's response.	Tyler O'Neal
3/5/2024	0.183333333	DL - Letters, faxes or emails	Read opposing counsel's questions concerning Certified Legal Interns and looked at local rules in reference to questions.	Tyler O'Neal
3/6/2024	0.05	DL - Letters, faxes or emails	Read Professor Geronimo's responses to opposing counsel's questions concerning Certified Legal Interns.	Tyler O'Neal
3/6/2024	0.033333333	DL - Letters, faxes or emails	Read opposing counsel's email that they do not object to our motion to let Certified Legal Interns participate.	Tyler O'Neal
3/6/2024	0.183333333	DC - Drafting/editing/reviewing court papers other than briefs	Read Siobhan's email that the court permitted Legal Interns to participate.	Tyler O'Neal
3/14/2024	0.2	TCO - Telephone call with other than client	Read city's new offer on attorney fees. Attempted to join Zoom meeting sent by Professor Geronimo, but meeting had ended.	Tyler O'Neal
			Discussed upcoming call with opposing counsel and developments in the Martin case.	Tyler O'Neal

3/14/2024	0.05	TCO - Telephone call with other than client	Attempted to call Mr. Russell to follow-up on letters sent previous evening. Did not answer.	Tyler O'Neal
3/14/2024	0.133333333	DO - Drafting/editing/reviewing other than above-describe	Read two letters sent to J.R. Russell last night in response to offer of attorney's fees and discovery requests.	Tyler O'Neal
TOTALS:	6.883333333	27.43333333		

Date	Non-billable	Billable	Activity category	Description	User
1/18/2024		2	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Conduct research on absolute immunity. Prepare memo analyzing City's claims that council members have immunity.	William Baker
1/19/2024		1.3	DD - Drafting/editing/reviewing documents other than court papers	Research and familiarize with background information on Martin matter including reviewing pleadings.	William Baker
1/19/2024		1.7	MS - Strategy Meeting(other than with client)	Meet with team to discuss Martin matter. Discuss status and receive assignments.	William Baker
1/19/2024		2	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Complete legal research on immunity and draft memo related to immunity.	William Baker
1/22/2024		2	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Review reply brief, review motion to participate, review City's most recent filings, read through emails from Team.	William Baker
1/24/2024		2	MS - Strategy Meeting(other than with client)	Meet with team to discuss City's most recent filing. Weigh options, discuss how to approach with client, discuss with client.	William Baker
1/31/2024		3	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Conduct research on law around reasonable attorneys fees. Discuss splitting up work with A. Bashein.	William Baker
2/5/2024		2	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Draft and edit motion for reasonable attorney's fees with A. Bashein.	William Baker
2/7/2024		2	MS - Strategy Meeting(other than with client)	Meet with A. Geronimo, S. Gerber, and A. Bashein to discuss assignment -- motion for attorney's fees. Strategize what to include in motion and how to pre-empt City's arguments. Assist A. Geronimo in sending email to City.	William Baker
2/7/2024		2.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Begin drafting motion for attorney's fees: split up work with A. Bashein, start drafting fact section.	William Baker
2/8/2024		3	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Read through each communication in Martin matter in Clio to include in motion for fees. Draft facts in a compelling narrative.	William Baker
2/8/2024		2.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Finish completing edits to facts section for motion for fees and edit parts of law and argument section incorporating facts more explicitly. Use transition memo for assistance.	William Baker
2/9/2024		0.333333333	MS - Strategy Meeting(other than with client)	Discuss Martin matter with A. Geronimo and A. Bashein. Ask question to A. Geronimo pertaining to suggested edits on motion inputted the night before. Establish plan and timeline for motion.	William Baker
2/12/2024		2.5	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Complete A. Geronimo's suggested edits to motion for attorney's fees. Reorganize brief, include more cites, develop persuasive narrative more fully. Establish plan with A. Bashein and send document to A. Bashein for more edits.	William Baker
2/13/2024		2	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Receive draft from A. Bashein and integrate edits into earlier section. Send next draft to A. Geronimo and S. Gerber.	William Baker
2/14/2024		1.5	Meeting - Internal	Meet with A. Bashein, A. Geronimo, and S. Gerber to discuss draft of fee petition in light of City's discovery requests and settlement offer. Discuss new arguments to add in response to City's demands.	William Baker
2/15/2024		3	DM - Drafting/editing/reviewing legal memos (briefs/motions)	Research several new arguments to include in motion for fees such as student time's compensability, complex cases increases fees. Began drafting into motion.	William Baker

2/16/2024	DM - Drafting/editing/reviewing legal memos 2 (briefs/motions)	Receive A. Bashein's edits to motion with new arguments. Work on making motion flow better in light of new arguments, copy-edit, and proofread.	William Baker
3/15/2024	DM - Drafting/editing/reviewing legal memos 2 (briefs/motions)	Review most updated draft of motion for attorney's fees in Martin matter. Leave several comments discussing broad impressions. Notify A. Geronimo that motion is ready for review.	William Baker

TOTALS: **7.3** **32.03333333**

Date	Non-billable	Billable	Activity category	Description	User
1/16/2024		1.2		Read news articles, review video of the incident, and read the Complaint.	Kaley Elliott
1/18/2024		0.2		Read redlines of policy.	Kaley Elliott
1/18/2024	0.51666667			Reading motion for TRO.	Kaley Elliott
1/18/2024	1.36666667			Finish reading Motion for Temporary Restraining Order; read the proposed order; begin reading Opposition to the Temporary Restraining Order.	Kaley Elliott
1/18/2024		1.4		Finish reading Opposition to Motion for Temporary Restraining Order; conduct legal research regarding city council and sui juris.	Kaley Elliott
1/20/2024	3.56666667			Research to prepare for a reply to the opposition to the motion for a preliminary injunction.	Kaley Elliott
1/21/2024	5.88333333			Prepare to reply to opposition to preliminary injunction.	Kaley Elliott
1/23/2024		5.5		Research and write in preparation for amended motion.	Kaley Elliott
1/23/2024	0.93333333			Watch Cleveland City Council Meeting stream.	Kaley Elliott
1/24/2024	4.28333333			Research and write in preparation for amended motion.	Kaley Elliott
1/25/2024		0.6		Review comments on research and provide writing to address those comments.	Kaley Elliott
1/29/2024		0.5		Consult with partner on project.	Kaley Elliott
1/29/2024		0.5		Review comments made on research.	Kaley Elliott
1/29/2024		1.6		Craft new argument against policy language.	Kaley Elliott
1/31/2024		5.3		Write summaries on cases.	Kaley Elliott
2/1/2024		1.7		Write case summaries and craft new argument.	Kaley Elliott
2/4/2024		0.6		Writing email.	Kaley Elliott
2/4/2024		2		Prepare Notice of Acceptance.	Kaley Elliott
2/6/2024		0.75		Review edits and redlines.	Kaley Elliott
TOTALS:	38.4	0			

Date	Non-billable	Billable	Activity category	Description	User
1/17/2024	2.48333333			Research issue of City Council's capacity to be sued.	Karina Pantoja
1/17/2024		1.7	Meeting - Internal	Prepare for and attend meeting regarding Defendant's opposition brief.	Karina Pantoja
1/18/2024		2.4	LR - Legal research	Research whether Cleveland City Council is non sui juris.	Karina Pantoja
1/19/2024		2.6		Review briefings and memos of matter.	Karina Pantoja
1/19/2024		1.5	Meeting - Internal	Prepare for and attend meeting regarding pleadings and background of the matter.	Karina Pantoja
1/23/2024		0.2		Review motion to participate.	Karina Pantoja
1/24/2024		0.4		Review research on sui juris.	Karina Pantoja
1/24/2024		0.6		Review filings in connection with an offer of judgment.	Karina Pantoja
2/6/2024	0.88333333			Attend meeting regarding fees motion and observe call with City Council regarding potential fees briefing.	Karina Pantoja
2/8/2024		0.5		Review filings.	Karina Pantoja
TOTALS:	13.26666667	0			

ANDREW GERONIMO

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TEACHING EXPERIENCE

Case Western Reserve University School of Law, Cleveland, Ohio

Lecturer in Law & Director, First Amendment Clinic, 2020 – present;

Director, Intellectual Property Venture Clinic, 2019 – 2020;

Stanton Foundation First Amendment Fellow, 2017-2018

Courses Taught:

First Amendment Clinic Seminar, 2020 – present; Fall 2018

- Supervise Certified Legal Interns in all aspects of speech-defense litigation, from pre-investigation, pleading, discovery, motion practice, trials, appeals, and settlement with an emphasis on client service and professional conduct;
- Represent clients in litigation matters asserting First Amendment civil rights claims, defending causes of action sounding in defamation, and public access to courts, court records, and public records.
- Counsel clients regarding newsgathering rights, access rights, pre-publication review, and other matters implicating speech rights.

Intellectual Property Venture Clinic Seminar, Spring 2019; 2019 – 2020

- Supervise Certified Legal Interns in corporate, transactional, and intellectual property matters for a student entrepreneur client base with an emphasis on client service and professional conduct;
- Co-taught bi-weekly seminar introducing students to contract drafting, corporate law concepts, intellectual property concepts, funding and valuation, and blue sky laws and exemptions;

First Amendment Government Transparency Lab, Spring 2018

First Amendment and the Arts Lab, Fall 2017 (co-taught with Adjunct Professor)

Other Faculty Service:

- Recipient, Latinx Law Students Association “Trailblazer Award,” 2023;
- Clinic Administrative Responsibilities: *Civil Rights Clinic Litigation Coverage* –Spring 2018, *Summer Clinic Coverage & Extern Supervision* – Summer 2019;
- Stephanie Tubbs Jones Summer Legal Academy (legal education program for inner-city high school students) – Summer 2019, Summer 2018;
- Student-Faculty Mentorship Program.

OTHER LEGAL EXPERIENCE

The Pattakos Law Firm, LLC, Fairlawn, Ohio

Of Counsel, 2019 – present

- Represent clients in First Amendment and other civil rights litigation.

Singerman, Mills, Desberg & Kauntz Co., LPA, Cleveland, Ohio

Associate Attorney, 2014 – 2017

- Represented clients in a wide variety of litigation matters in state and federal courts through all stages of litigation, from intake, evaluation, pleading, motion practice, discovery, summary judgment, trial, settlement, and appeal.
- Matters included contract- and statutory-based claims, injunctions, eviction, zoning, quiet title and other real property claims, intentional torts, negligence, the Uniform Commercial Code, nondisclosure/trade secrets, eviction, and foreclosure.
- Counseled clients on business, corporate, and compliance issues including areas of real estate, employment, environmental, professional licensing, and trade secret.

Mansour, Gavin, Gerlack & Manos Co., LPA, Cleveland, Ohio

Associate Attorney, 2012 – 2014

- Represented clients in a wide variety of litigation matters in state and federal courts and before administrative boards, including cases relating to negligence, breach of contract, civil rights, fair housing, products liability, employment, and defamation and other intentional torts.

Baker & Hostetler LLP, Cleveland, Ohio

Staff Attorney, 2011 – 2012

- Assisted in preparation of case materials and analysis of e-discovery issues for the liquidation proceeding of Bernard L. Madoff Investment Securities LLC and related litigation matters.
- Reviewed and analyzed pleadings, evidence, and discovery materials for complex securities and financial fraud issues in a time-pressured litigation setting.

Cleveland Metropolitan Bar Association, Cleveland, Ohio

Staff Attorney, 2010 – 2011

Law Clerk, 2008 – 2010

- Investigated and prosecuted attorneys accused of ethical misconduct and non-attorneys accused of engaging in the unauthorized practice of law.
- Drafted ethics opinions providing guidance on compliance with the Ohio Rules of Professional Conduct.

Federal Public Defender for the Northern District of Ohio, Cleveland, Ohio

Legal Extern, 2009

- Researched legal issues and wrote motions for indigent defendants' criminal matters in the U.S. District Court for the Northern District of Ohio and the Sixth Circuit Court of Appeals involving allegations of violence, terrorism, internet-based crimes, and drug and firearm crimes.

EDUCATION

Case Western Reserve University School of Law, Cleveland, Ohio

J.D., 2010

- Dean's Honor List;
- Founding Member & Co-Editor in Chief, *Journal of Law, Technology & the Internet*;
- CALI Excellence for the Future Award Recipient, *Copyright in the Digital Millennium Seminar (Towards a Postmodern Conception of Authorship in U.S. Copyright Law)*;
- Social Justice Fellow, Federal Public Defender;
- Selected Participant, *Cleveland Bar Association Minority Clerkship Program*.

Fort Lewis College, Durango, Colorado

B.A., English, 2005

- Senior Thesis, *Translation as Deconstruction: Authorial Intention and the Role of the Translator*, selected for 2006 Int'l Assn. for Translation and Intercultural Studies Conference; Helpdesk Technician in the Information Technology Dept.

PUBLICATIONS

[*Memo to Larry Householder: The First Amendment Guards against using political position to suppress dissenting speech*](#), CLEVELAND.COM (June 17, 2019).

[*Ohio Open Government Guide*](#), Reporters Committee for Freedom of the Press (2019 Update, with David Marburger).

Ohio Adopts the Uniform Bar Exam, Cleveland Metropolitan Bar Journal, October 2018.

PRESENTATIONS

Panelist, [*Protecting Everyones' Constitutional Rights: Panel on Qualified Immunity*](#), Institute for Justice & Case Western Reserve University Social Justice Institute, Feb. 18, 2023.

Panelist, [*From the Civil Rights Movement to Depp v. Heard: New York Times v. Sullivan, its Past, Present, and Future*](#), American Bar Association Forum on Communications Law Pro Bono Day of Service, Loyola University New Orleans School of Law, Feb. 2, 2023.

Moderator, *America's Classrooms: Frontlines of the First Amendment*, [*Panel II: Academic Freedom and Student Mistreatment*](#), Case Western Reserve Law Review Symposium, Oct. 28, 2022

[*Jacobellis v. Ohio and the Trouble With Obscenity*](#), Cleveland Metropolitan Bar Association Walking CLE Tour, July 14, 2022.

Media & The Law, Cleveland-Marshall College of Law Alumni Association CLE program, Apr. 22, 2022.

Truth, Lies, and Malice: First Amendment Limits on State Defamation Law, CWRU School of Law Homecoming CLE Presentation, Oct 23, 2021.

The Intersection of the Law and Social Media, Cleveland Metropolitan Bar Association Media and the Law Series, Dec. 14, 2020

Political Activism, Lobbying, and Free Speech, Cleveland Metropolitan Bar Association Volunteer Lawyers for the Arts, Oct. 27, 2020.

Police Body Cameras & Facial Recognition, Cleveland Metropolitan Bar Association Media and the Law Series, Oct. 16, 2020.

Communications Decency Act Section 230 and The Future of Online Speech, CWRU School of Law Panel Discussion, June 30, 2020.

Written Testimony regarding Government Transparency, Ohio House of Representatives, Subcommittee on Criminal Sentencing, Nov. 16, 2019.

A Discussion of Gibson Bros. Inc. v. Oberlin College: The First Amendment on College Campuses, Cleveland Metropolitan Bar Association, Oct. 24, 2019.

Internet Free Speech: Blocking, Banning & Removing Content, Case Western Reserve University School of Law Louis C. Greenwood Lecture Series Downtown at the City Club, The City Club of Cleveland, Oct. 16, 2019.

Protest Art: Free Speech and Its Legal Boundaries, Cleveland Metropolitan Bar Association Volunteer Lawyers for the Arts, Spaces Gallery, Nov. 29, 2018.

Judicial and Attorney Ethical Issues in Serial Podcast, Season 3, Ursuline College Paralegal Studies Legal Ethics Course, Oct. 10, 2018.

Guest Lecture, *Attorney Discipline Litigation Overview*, Ursuline College Paralegal Studies Legal Ethics Course – February 2011, February 2014, January 2017

Guest Lecture, *Networking Skills Workshop/Relationship Building Panel*, Case Western Reserve University School of Law Professional Development Series – August 2015, October 2016

SELECTED LITIGATION MATTERS

Clinical Litigation (direct client representation while supervising students / fellows)

- *City of Beachwood and Katherine McLaughlin v. John Doe*, Cuyahoga County Court of Common Pleas, representing anonymous internet commenter sued for defamation, successfully defended a Motion to Authorize Discovery based upon the Court's ruling that all of the posts at issue was constitutionally protected speech.

- *Thompson-Hashman v. Whitmore, et al.*, Athens County (Ohio) Court of Common Pleas No. 20CI00094 (2020-2023), representing a defendant in a defamation lawsuit, obtained summary judgment on defamation, intentional infliction of emotional distress, and civil conspiracy claims in case involving a former Clerk of City Council, hired while her father was a Councilmember, who sued anonymous internet commenters for criticism of her official conduct for “nepotism” and “corruption.”
- *State ex rel. Standifer & Cleveland Scene v. City of Cleveland*, Ohio Sup. Ct. No. 2021-1280, 2022-Ohio-3711, representing investigative journalist and local alt-weekly in Ohio Public Records Act case involving the Cleveland Division of Police’s Use-of-Force reports. After Ohio’s Eighth District Court of Appeals found the records were exempt from disclosure as Confidential Law Enforcement Investigatory Records, appealed to The Supreme Court of Ohio, which reversed and ordered the release of records unless the City made a specific showing.
- *State ex rel. Dissell v. City of Cleveland*, Ohio Ct. App. 8th Dist., representing investigative journalist in Ohio Public Records Act case involving data in the City of Cleveland’s “Mayor’s Action Center,” a telephone number and website form soliciting input from the public on city services.
- *State ex rel. Ideastream Public Media v. City of Cleveland & State ex rel. Ideastream Public Media v. Cleveland Metropolitan Housing Authority*, Ohio Ct. App. 8th Dist., representing investigative journalist and public media outlet seeking surveillance video of Cleveland Metropolitan Housing Authority police fatally shooting a young man.
- *Wood v. Eubanks*, (6th Cir. No. 20-3599, decision at [25 F.4th 414](#) (6th Cir. 2022)), supervised Clinical Fellow in her first appellate argument in a case involving claims of First Amendment retaliation for client’s ejection from a County fair while wearing a t-shirt that said “Fuck the Police.” We successfully argued for a narrow view of “fighting words” in light of Ohio’s disorderly conduct statute, and successfully defeated the officers’ qualified immunity defense.
- *Koger v. Mohr et al.* (N.D. Ohio No. 4:17-cv-02409)(6th Cir. No. 19-4020, decision at [964 F.3d 532](#) (6th Cir. 2020)), (Representing Rastafarian inmate bringing claims against prison officials under the First and Fourteenth Amendments and the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. §§ 2000cc, et seq., for burdening his religious exercise in a discriminatory way. Briefed Summary Judgment, obtained reversal of grant of summary judgment in the United States Court of Appeals for the Sixth Circuit, and supervised three students and one clinical fellow in a 4-day bench trial).
- *Cover v. Ohio Department of Rehabilitation and Correction* (Ohio Court of Claims) (public records litigation regarding prison video of the force-cut of client’s

dreadlocks (see above)). *State of Ohio v. Hawkins* (Ohio Ct. App. 8th Dist. No. CA-18-108057) (Supervising student appeal of a criminal matter alleging ineffective assistance of counsel).

- *State of Ohio v. Hawkins* (Ohio Ct. App. 8th Dist. No. No. 18-107821) (Supervising student appeal of a criminal matter alleging ineffective assistance of counsel).
- *Phillips v. Cincinnati*, (S.D. Ohio No. 1:18-cv-00541) (Representing homeless people challenging the criminalization of homelessness, bringing claims under the First, Fourth, Fifth, Eighth, and Fourteenth Amendments).
- *State ex rel. Advance Ohio v. Breaux* (Ohio Ct. App. 9th Dist. No. CA-28642) (Representing media outlet bringing writs of mandamus and prohibition against trial judge and common pleas court, alleging a wrongful restraint on public access to a civil case alleging widespread fraud by a personal injury law firm).

Private Practice

- *Lawless v. Cleveland State University* (N.D. Ohio No. 1:19-cv-00178) (Representing artist bringing claims under the First Amendment and the Visual Artists Rights Act, 17 U.S.C. § 106A and a request for injunctive relief against a public university for censoring his sculpture on university property).
- *Bedford Associates, et al. v. Coleman Ali-El, et al.* (Ohio C.P., Cuyahoga Cty., No CV-16-869226; N.D. Ohio No. 1:16-cv-03016) (Representing property owner seeking injunctive relief for defendant's alleged harassment by stalking, malicious prosecution, and defamation).
- *Lake Breeze Condominium Owners Assn. v. Eastlake Ohio Developers LLC* (Ohio C.P., Lake Cty., No. 16-CV-001477) (Representing property owner seeking injunctive relief and damages to prevent defendant's alleged trespass to build a housing development).
- *Meldon v. Village of Chagrin Falls* (Ohio C.P., Cuyahoga Cty., No. 16-CV-866473; N.D. Ohio No 1:16-cv-02085) (Civil rights action alleging unlawful arrest, imprisonment, and wrongful condemnation of client's property).
- *Wildberry Homeowners Assn. v. Schuffert* (Ohio Ct. App. 9th Dist. No. 15-CA-010840) (Representing homeowners association in appeal seeking enforcement of association declarations against homeowner).
- *Abbe Road Realty, LLC v. Kuehne & Nagel, Inc.* (N.D. Ohio No. 1:14-cv-02463) (Representing property owner in commercial lease dispute).

- *Hurd v. Polverine, et al.* (N.D. Ohio No. 1:12-cv-02037) (Representing government officials in civil rights action brought by inmate alleging excessive force and denial of medical care).
- *Teodecki v. Litchfield Twp.* (N.D. Ohio No. 1:11-cv-2737) (Representing government officials in claims of First Amendment retaliation, defamation, and a constitutional right of privacy).
- *Cleveland Metropolitan Bar Assn. v. Axner*, 135 Ohio St.3d 241, 2013-Ohio-400 (Ohio Sup. Ct.) (disciplinary case against attorney accused of neglecting client matters, failure to communicate with clients, and failure to cooperate with the investigation).
- *Cleveland Metropolitan Bar Assn. v. Brown*, 143 Ohio St.3d 333, 2015-Ohio-2344 (Ohio Sup. Ct.) (disciplinary case against attorney for neglecting client matters, mishandling client funds, and other misconduct).

PROFESSIONAL MEMBERSHIPS & COMMUNITY ACTIVITIES

Amicus Curiae, *Bey v. Resawehr*, Ohio Supreme Court No. 2019-0295 (regarding the balance between the First Amendment and civil stalking protection orders prohibiting persons from posting on social media).

Advisory Board Member, *Initiative for a Representative First Amendment*, Berkman Klein Center for Internet & Society and the Cyberlaw Clinic at Harvard University

Member, Free Expression Legal Network

Committee Member (2010-2020), Certified Grievance Committee, Cleveland Metropolitan Bar Association

Committee Member (2010-present), Bar Admissions Committee, Cleveland Metropolitan Bar Association

Board Member, Legal Studies Advisory Board, Ursuline College

Member, Clinical Legal Education Association

Volunteer Judicial Panelist, Ohio High School Mock Trial Competition

MEDIA MENTIONS

WOIO Staff, [*Judge Strikes Down Bid to ID Critic*](#), WOIO Cleveland (CBS Affiliate), Apr. 24, 2023.

Mark Oprea, [*Judge Denies Beachwood Police Chief's Attempt to Identify Anonymous Commenter*](#), Cleveland Scene, Apr. 22, 2023.

Spectrum News Staff, [Implications of Fox News, Dominion Voting Systems settlement, Spectrum News](#), Apr. 20, 2023.

Eric Heisig, [Norfolk Southern Judge's Frank Demeanor Demands Lawyers' Focus](#), Bloomberg, Apr. 20, 2023.

The Athens Messenger staff, [Lawsuit against Nelsonville Crackheads Facebook page administrator settled](#), The Athens Messenger, Apr. 19, 2023.

Harry Brunius, [Dominion v. Fox: Could case be weaponized against freedom of press?](#), [Christian Science Monitor](#), Apr. 17, 2023.

Alex Woodward, [Will Fox News settle the Dominion defamation lawsuit? First Amendment experts aren't so sure](#), The Independent, Mar. 17, 2023.

The Megyn Kelly Show, [Dominion and Fox News Arguments in Major First Amendment Case](#), SiriusXM, Mar. 3, 2023 (live cable news appearance).

Stephen Battaglio, [How strong is Dominion's defamation case against Fox News? Legal experts weigh in](#), Los Angeles Times, Mar. 1, 2023.

Case.edu, [First Amendment Clinic recovers \\$29,750 in Attorneys' Fees In \\$155,000 Settlement in Civil Rights Lawsuits for Violation of First Amendment Rights](#), Feb. 22, 2023.

Scripps News "Morning Rush," Panel Discussion on Actual Malice and Dominion's Motion for Summary Judgment in [Dominion Voting Systems v. Fox Corp.](#) defamation lawsuit, Feb. 20, 2023 (live cable news appearance).

Becky Raspe, [CWRU School of Law enters City of Beachwood vs. John Doe Lawsuit](#), Cleveland Jewish News, Feb. 8, 2023.

Cory Shaffer, [National organization wants to join legal fight over Beachwood, police chief's efforts to unmask anonymous critics](#), [cleveland.com](#), Jan. 23, 2023.

Cory Shaffer, [Beachwood, police chief file defamation lawsuit to find out who has been anonymously criticizing her](#), [cleveland.com](#), Jan. 12, 2023.

Jessi Schulz, [Ethan Liming family attorney considering a lawsuit against TikTok and toy-gun manufacturer after teen's death](#), WEWS Cleveland, July 28, 2022.

Peter Hunt Szpytek, [A look into Texas' controversial anti-censorship law HB 20](#), Digital Trends (May 23, 2022).

Trone Dowd, [It's Totally Legal to Yell 'Fuck You' at Cops. Why are People Still Getting Arrested?](#), Vice News, (Mar. 3, 2022).

Jessie Balmert, [*Tired of political text messages? Do Not Call list won't help*](#), Cincinnati Enquirer (Jan. 31, 2022).

[*Faculty Network Interview: Andrew Geronimo, Case Western Reserve University*](#), Foundation for Individual Rights and Expression (Nov. 22, 2021).

Cory Shaffer, [*Judge rejects Cuyahoga County prosecutor's request for gag order against man whose 1989 murder conviction was overturned*](#), cleveland.com (Oct. 29, 2021).

Dani Kington, *Lawyer for CrackHeads page alleges potential misconduct in defamation, free speech case*, Athens Messenger (Oct 1., 2021).

Gary White, [*Rep. Scott Franklin's limits on Facebook comments draw complaints*](#), The Lakeland (FL) Ledger (Aug. 26, 2021).

Henry Gass, Harry Bruinius, Chelsea Sheasley, [*The case of the cursing cheerleader: Justices give students free speech win*](#), Christian Science Monitor (June 24, 2021).

Brad Kutner, [*Virginia Republican Files Defamation Suit Over Anonymous Text Calling Him Gay*](#), Courthouse News (May 4, 2021).

Mary Hansen, [*Can Cops Say That?*](#), NPR Illinois/Illinois Times, (Apr. 8, 2021).

Brad Kutner, [*Trump Insurrection Creates Complex Civil Liability Questions*](#), Courthouse News (Feb. 13, 2021).

Sam Allard, *Two Indicted on Felony Assault Charges for Using Megaphones at TownHall Protest*, Cleveland Scene (Jan. 28, 2021).

Vince Grzegorek, *Do U.S. Trademark Office Rulings Give Early Insight Into Possible New Names for Cleveland Indians?*, Cleveland Scene (Jan. 25, 2021).

Aja Romano, [*Kicking people off social media isn't about free speech*](#), Vox (Jan. 21, 2021).

Courtney Astolfi, [*First Amendment scholars weigh in on legality of Terminal Tower "Biden Harris" light display*](#), Cleveland.com (Oct. 5, 2021).

Eric Heisig, [*Mass gatherings of 100 or more are banned in Ohio because of coronavirus. So why can people still go to church?*](#), Cleveland.com (Mar. 13, 2020).

Evan MacDonald, [*Citizen app debuts in Cleveland, bringing crime alerts to users' cellphones*](#), Cleveland.com (Feb. 17, 2020).

Shira Feder, [*Why we over-share on dating apps \(even when we know we shouldn't\)*](#), Insider (Feb. 14, 2020).

- Todd DeFeo, [Ohio Senate approves campus free speech measure](#), The Center Square (Feb. 4, 2020).
- Kevin Barry, [New service called 'Bark' helps teachers monitor and protect children from online bullying](#), WEWS NEWS5 Cleveland (Feb. 5, 2020).
- Mason Vera Paine, [Sorting Through COPPA](#), WGN Radio 720 (Dec. 9, 2019).
- Rachel Polansky, [3News Investigates Ring's Cozy Relationship With Four Northeast Ohio Police Departments](#), WKYC-TV Cleveland (Nov. 12, 2019).
- Scott Fallon and Lindy Washburn, [A year after Wanaque deaths, NJ still refuses to release documents showing its response](#), North Jersey Record (Oct. 23, 2019).
- Sabrina Eaton, [Geauga County Judge David Ondrey won't release letters written on Scott Coleman's behalf](#), cleveland.com (Oct. 18, 2019).
- Olivia Fecteau, [Fans alert local T-shirt company to copycats](#), WEWS News 5 Cleveland (Aug. 1, 2019).
- Bill Sheil, [I-Team: Court battle to find out how much local community college paid actress to speak at luncheon](#), FOX 8 Cleveland (June 26, 2019).
- Joe Pagonakis, [Local experts say Facebook needs more scrutiny after New Zealand Massacre was broadcast live](#), WEWS News 5 Cleveland (Mar. 15, 2019).
- Chance Seales, [Social Media Content Moderation](#), Newsy The Why (Mar. 19, 2019).
- Alan Cohn, [Who are you really engaging with on social media?](#), WOIO Channel 19 News Cleveland (Feb. 14, 2019).
- Lindsay McKenzie, [Liberty University stands by CIO, despite questionable business activities](#), Inside Higher Ed (Jan. 29, 2019).
- Nick Castele, [Lawsuit Says Cleveland State Censored Sculpture Criticizing Trump](#), ideastream (Jan. 24, 2019).
- Eric Heisig, [Lawsuit against Cleveland State says officials censored phrase critical of Trump on large sculpture](#), cleveland.com (Jan. 24, 2019).
- Vince Grzegorek, [Artist Sues Cleveland State for Censoring Trump Message on His Iconic 'The Politician: A Toy' Sculpture](#), Cleveland Scene (Jan. 24, 2019).
- Annie Zaleski, [Protecting Speech: New law clinic defends First Amendment rights](#), CWRU Think Magazine (Summer 2018).

Cory Shaffer, [*Judge lifts gag order in KNR lawsuit and restores access to court records*](#), cleveland.com (Oct. 16, 2017).

Cory Shaffer, [*Lawyers for cleveland.com ask appeals court to lift KRN lawsuit gag order, restore access to records*](#), cleveland.com (May 19, 2017).

BAR ADMISSIONS

Ohio (2010); U.S. Court of Appeals for the Sixth Circuit (2012); U.S. District Court, N.D. Ohio (2012), U.S District Court, S.D. Ohio (2017).

SARA COULTER

Case Western Reserve University School of Law

sara.coulter@case.edu

TEACHING EXPERIENCE

Case Western Reserve University School of Law, Cleveland, Ohio

Senior Fellow, First Amendment Clinic, 2023-present.

Fellow, First Amendment Clinic, 2021-2023.

- Co-teaches weekly First Amendment seminar.
- Leads discussion on various aspects of civil litigation, including the discovery process.
- Speaks to other classes, including LLEAP 3, about the First Amendment Clinic.
- Meets with students individually to help them reach their personal and professional goals.

LEGAL EXPERIENCE

Case Western Reserve University School of Law, Cleveland, Ohio

Senior Fellow, First Amendment Clinic, 2023-present

Fellow, First Amendment Clinic, 2021-2023

- Defends clients against defamation and tort claims involving the right to free speech.
- Drafts discovery motions, dispositive motions, and other briefs and memoranda.
- Prevailed in appeal to reinstate client's First Amendment retaliation case in the Sixth Circuit Court of Appeals, defeating qualified immunity.
- Deposed the plaintiff in a defamation case brought against anonymous speaker.
- Directed and cross-examined witnesses in a federal bench trial.

Office of the Ohio Attorney General, Major Litigation Section, Columbus, Ohio

Assistant Attorney General, 2019-2021

- Managed third-party discovery for over 25 state agencies in Ohio's opioid lawsuits.
- Oversaw document review teams using the Everlaw platform.
- Coordinated depositions and document productions.
- Briefed motions for protective orders and motions to quash.

Office of the Ohio Attorney General, Antitrust Section, Columbus, Ohio

Assistant Attorney General, 2017-2019

- Investigated allegations of anticompetitive conduct in multiple complex fields.
- Developed case theories and trial strategies for a multistate monopoly case.
- Negotiated document requests with targets of investigations.
- Presented to public purchasing officials to help them identify bid-rigging and price-fixing.

Cloppert, Latanick, Sauter, & Washurn, Columbus, Ohio

Law Clerk, 2016-2017

- Researched and drafted legal memoranda on various issues facing local unions.
- Attended unemployment compensation and unfair labor practices proceedings.

Ohio Supreme Court- Chief Justice O'Connor, Columbus, Ohio

Judicial Extern, Spring 2016

- Analyzed cases on appeal and wrote memoranda on the legal issues involved.

PLAINTIFF'S
EXHIBIT

1-D

EDUCATION

The Ohio State University Moritz College of Law, Columbus, Ohio

Juris Doctor, 2017, *cum laude*

- Dean's Scholar Award for Top 15%.
- The Order of Barristers.
- I/S: A Journal of Law and Policy for the Information Society.

Valparaiso University, Valparaiso, Indiana

Bachelor of Arts, Communication with a Concentration in Law, 2014, *summa cum laude*

- Christ College Scholar (Interdisciplinary Honors College).
- Classical Civilizations and Humanities Minors.

SELECTED LITIGATION MATTERS

- *Wood v. Eubanks et al.* (25 F.4th 414 (6th Cir. 2022)) (Prevailed in an appeal in the Sixth Circuit to reinstate client's claims after client was retaliated against and arrested for his speech, including a t-shirt that read "fuck the police" at a county fairground).
- *Koger v. Mohr et al.* (N.D. Ohio No. 4:17-cv-02409) (First-chair trial experience in Federal District Court representing Rastafarian inmate bringing claims against prison officials under the First and Fourteenth Amendments and the Religious Land Use and Institutionalized Persons Act for burdening his religious exercise in a discriminatory way).
- *Thompson-Hashman v. Whitmore* (Athens County Court of Common Pleas, 20-CI-00094) (Deposed Plaintiff in defamation suit brought against client, an anonymous administrator of a satirical Facebook page. Briefed and was awarded Summary Judgment on defamation and auxiliary claims).
- *McLaughlin, et al. v. John Doe*, (Cuyahoga County Court of Common Pleas, CV-22-973016) (Represented anonymous defendant accused of defamation by the City of Beachwood and its police chief. Entered limited appearance to oppose motion for discovery into client's identity. Plaintiffs voluntarily dismissed after the Court did not allow discovery into the identity of the anonymous speakers).
- *State ex rel., Lauren "Cid" Standifer, et al., v. City of Cleveland* (Appeal to the Ohio Supreme Court, Case No. 2021-1280) (Prevailed in an appeal to the Ohio Supreme Court to reverse Eighth District Court of Appeals' ruling that allowed police department to withhold use of force reports as confidential law enforcement investigatory records).
- *West, et al. v. Jordan, et al.* (Erie County Court of Common Pleas, 2021-CV-0447) (Represented defendant accused of defamation after client spoke out on matters affecting school district. Drafted portions of discovery requests).
- *Collegetown Blue L.P. v. Bar One II LLC* (Cleveland Municipal Court, 21-CVG-10467) (Plaintiff restaurant voluntarily dismissed tortious interference claims against client, a student newspaper, after newspaper reported on dining options available to the campus. Drafted portions of Motion to Dismiss).

- *State of Ohio v. McKesson Corporation, et al.* (Madison County Court of Common Pleas, CVH20180055) (Represented third-party state agencies in discovery proceedings in State of Ohio's opioid litigation against distributors).
- *State of Ohio v. Purdue Pharma L.P., et al.* (Ross County Court of Common Pleas, 17CI000261) (Represented third-party state agencies in discovery proceedings in State of Ohio's opioid litigation against manufacturers).
- *State of Wisconsin et al. v. Indivior* (E.D. Pa. Sept. 22, 2016) (Subject matter expert for multistate litigation case against makers of Suboxone, a drug used to treat opioid addiction, who allegedly engaged in a scheme to block generic competitors and raise prices).

MEDIA MENTIONS & APPEARANCES

- Vince Grzegorek, <https://www.clevescene.com/news/heres-the-satirical-piece-about-jim-renacci-his-team-demanded-we-delete-because-they-thought-you-wouldnt-think-it-was-a-joke-41586120>, Cleveland Scene, March 13, 2023.
- [Fox News v. Dominion Trial on Hold After Last Minute Delay Announced](#), Scripps News, April 17, 2023.
- [Fox News Reaches Settlement in a Defamation Lawsuit with Dominion Voting Systems](#), Scripps News, April 19, 2023.
- [Let's Get Personal with Sara Coulter, First Amendment Fellow at Case Western Reserve University School of Law](#), Personal Jurisdiction Podcast, Sept. 19, 2023.

AWARDS, PRESENTATIONS, & ORGANIZATIONS

- [Social Media & The Law: Online Criticism of Government Actors](#), Cleveland Metropolitan Bar Association's Department of Continuing Legal Education, Sept. 28, 2023.
- [Banned Books: Legal Panel Discussion](#), Heights Libraries, Oct. 2, 2023.
- Member, Free Expression Legal Network.
- Member, Clinical Legal Education Association.
- Member, Association of American Law Schools.
- Presenter, Ohio Attorney General's 2020 eDiscovery Symposium.
- Member, Ohio Attorney General's eDiscovery Team, 2019-2021.
- Mentor, Ohio Attorney General's Teen Ambassador Board, 2020-2021.
- Coach, Moritz's NYC Bar Association National Moot Court teams, 2018.
- Runner-Up, NYC Bar Association National Moot Court Competition, 2017.
- 1st Place, National Moot Court Competition in Child Welfare & Adoption Law, 2016.

BAR ADMISSIONS

- State of Ohio (2017); U.S. Court of Appeals for the Sixth Circuit (2021); U.S. District Court, N.D. Ohio (2021).

SIOBHAN GERBER

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siobhan.gerber@case.edu | (206) 953-7940

EDUCATION

Washington University School of Law, St. Louis, MO

May 2021

Juris Doctor, *magna cum laude* | GPA: 3.86

-Order of the Coif

-Dean's List 2018-2021

-CALI Awards in Property and Arbitration Law Theory and Practice

-Scholar in Law Award (merit-based scholarship)

-*Washington University Law Review*, Vol. 98, Notes Editor

The University of Chicago, Chicago, IL

June 2017

A.B. in History and Law, Letters, & Society with Honors | GPA: 3.73

Thesis: "The 1880s Land Management Controversy in the Yosemite Valley: Conceptions of
Wilderness and the Role of Indigenous Populations in the Creation of National Parks"

Honors: Dean's List 2013-2017; University Scholar (merit-based scholarship)

CLERKSHIPS

United States Court of Appeals for the Sixth Circuit, Detroit, MI

September 2022 – August 2023

Law Clerk to the Hon. Eric L. Clay

United States District Court, Northern District of Ohio, Cleveland, OH

August 2021 – August 2022

Law Clerk to the Hon. J. Philip Calabrese

EXPERIENCE

FIRST AMENDMENT CLINIC, Case Western Reserve University School of Law, Cleveland, OH

Legal Fellow, September 2023 – present. Assists with all aspects of the Clinic's litigation on speech matters in State and federal court, including drafting motions, briefs, and memorandum. Supervises third-year law students by reviewing all student work product and meeting individually to further their personal and professional goals.

FIRST AMENDMENT CLINIC, Washington University, St. Louis, MO

Student Attorney, January 2021 – May 2021. Sought public records relating to in-custody deaths in Missouri state prisons. Wrote discovery requests and conducted a deposition in a public access case. Interviewed clients and witnesses and wrote briefing in opposition to dismissal in a case involving racial justice protesters subject to unlawful dispersal orders.

PLAINTIFF'S
EXHIBIT

1-E

Summer Law Clerk, Summer 2020. Researched and wrote memoranda on prison mail censorship and police dispersal orders during public protests. Sought public records related to COVID-19 under the Missouri Sunshine Law.

ST. FRANCIS COMMUNITY SERVICES, Immigration Law Project, St. Louis, MO

Legal Volunteer, January 2020 – March 2020. Wrote the factual background and country conditions components of an asylum law brief.

UNITED STATES ATTORNEY’S OFFICE, Boise, ID

Extern, May 2019 – July 2019. Researched and wrote memoranda on issues such as illegal reentry, compassionate release, and fraud.

JESUIT VOLUNTEER CORPS NORTHWEST, Boise, ID

Jesuit Volunteer AmeriCorps Member, August 2017 – July 2018. Served as the Outreach Coordinator at the Women’s and Children’s Alliance. Educated community groups and raised community awareness about domestic abuse and sexual assault.

PUBLICATION

Note, “*Extraordinary and Compelling*” *Circumstances: Revisiting the Role of Compassionate Release from the Federal Prison System in the Wake of the First Step Act*, 98 WASH. U. L. REV. 1543 (2021).

BAR ADMISSIONS

State of Ohio (2021) - No. 0101563

U.S. Court of Appeals for the Sixth Circuit (2023)

U.S. District Court for the Northern District of Ohio (2023)